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ABSTRACT

This report for Congress covers a number of fundamental but controversial issues relating to the overall objectives, direction, and pace of the equal employment opportunity (EEO) program for federal employees and job applicants, including some recommendations. The content is presented in nine chapters. The first is an introduction covering legislative background, affirmative action planning, and the scope of this report. Chapter 2 on the need to resolve fundamental issues on direction and pace of EEO programs briefly discusses some basic problems, including basic purpose of EEO, intended beneficiaries, efforts versus results, and goals versus quotas. In the third chapter, focus is on female and minority hiring, including statistical information regarding women and minorities in the federal work force and barriers to EEO progress. Chapter 4 discusses program organization and resources, while the next chapter covers setting affirmative action plan employment goals. Chapter 6 on submission, review, and approval of affirmative action plans focuses on the timeliness of submitting and reviewing plans, the need for improved Civil Service Commission (CSC) guidance, and the need for revising review practices. Recruitment efforts and problems are covered in the seventh chapter and EEO program evaluation is the topic of chapter 8. The concluding chapter presents the problems in evaluating EEO programs. (EM)

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REPORT TO THE CONGRESS

CE

BY THE COMPTROLLER GENERAL OF THE UNITED STATES

Problems In The Federal Employee Equal Employment Opportunity Program Need To Be Resolved

U.S. Civil Service Commission and Other Federal Agencies

GAO could not determine whether the equal employment opportunity program for Federal employees and job applicants was adequate and effective because there were no objective or widely agreed upon ground rules showing what the standards of accomplishment should be.

Basic but controversial problems on the purposes, direction, and pace of the program need resolving. The often conflicting views of the Civil Service Commission and other Federal agencies and private and public organizations need to be aired.

In the meantime, the Civil Service Commission and other Federal departments and agencies need to work out other problems with the program concerning organization and resources, setting affirmative action plan goals, submitting affirmative action plans, recruiting, and evaluating the equal employment opportunity program.

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FPCD-76-85

SEPTEMBER 9, 1977

COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-178929

To the President of the Senate and the
Speaker of the House of Representatives

This report discusses a number of fundamental but controversial issues relating to the overall objectives, direction, and pace of the equal employment opportunity program for Federal employees and job applicants; these issues need to be resolved for the program to become as unified and effective as possible.

The Chairman, Senate Committee on Labor and Public Welfare, requested that we review the implementation of the Equal Employment Opportunity Act of 1972, as it applies to Federal employees. This report, one of several resulting from the Chairman's request, sets forth the results of our review of selected hiring practices of Federal agencies and of certain other administrative, planning, and evaluation matters relating to equal employment opportunity; these matters include organization and resources, affirmative action goals and plans, recruitment, and Civil Service Commission and agency evaluations.

We made our review pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C 67).

We are sending copies of this report to the Director, Office of Management and Budget; the Chairman, Civil Service Commission; the Secretaries of Defense, Air Force, Agriculture, the Interior, and the Treasury; the Secretary of Health, Education, and Welfare; the Administrators, General Services and Veterans Administrations; and the Postmaster General of the United States Postal Service.

Elmer B. Staats
Comptroller General
of the United States

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

PROBLEMS IN THE FEDERAL EMPLOYEE EQUAL EMPLOYMENT OPPORTUNITY PROGRAM NEED TO BE RESOLVED

U.S. Civil Service Commisssion
and Other Federal Agencies

DIGEST

GAO could not determine whether the equal employment opportunity program for Federal employees and job applicants was adequate and effective because no objective or widely agreed on ground rules showed what the standards of accomplishment should be. (See pp. 17 and 94.)

Basic but controversial problems on the purposes, direction, and pace of the program need resolving. The often conflicting views of the Civil Service Commission and other Federal agencies and private and public organizations need to be aired.

In the meantime, the Civil Service Commission and other Federal departments and agencies need to work out other problems with the program. Recommendations are on pages 52, 53, 64, 75 and 93. These recommendations concern organization and resources, setting affirmative action plan goals, submitting affirmative action plans, and evaluating equal employment opportunity programs.

After more than 5 years, the basic thrust of the Federal equal employment opportunity program is in many ways still confused, fragmented, and in disarray because

--disagreement exists on what "equal employment opportunity" means;

--program goals and objectives are not clearly stated;

--criteria do not clearly show how to set appropriate employment goals and evaluate accomplishments and successes;

--disagreement exists on who the beneficiaries of the program are intended to be;

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--confusion exists on when a numerical employment target is a "permissible goal" or an "impermissible quota;"

--Federal enforcement agencies treat the Government's internal program and programs in private business and State and local governments differently;

--disagreement exists on whether goals can be realistically met within the constraints of current merit system regulations and procedures;

--the stress on setting and meeting challenging hiring goals often causes problems for Federal agencies;

--the goal-setting process for hiring is not often carefully conducted, and, where it has been, it is generally based directly or indirectly on proportional representation with little regard to available and qualified people with needed skills, experience, and training; and

--statistical data and other information needed to set realistic goals and to evaluate program progress and problems are often unavailable or inadequate. (See chs. 2 and 9.)

TRENDS IN HIRING

According to Civil Service Commission data, the number and percent of minority group members (Blacks, Hispanics, American Indians, and Oriental Americans) holding Federal jobs have remained about the same since 1972, as follows:

	Total Federal civilian employment	Minorities	
		Number	Percent
Nov. 30, 1972	2,542,067	509,307	20.0
Nov. 30, 1974	2,432,314	511,151	21.0
May 31, 1976	2,359,418	485,235	20.6

About 647,000 women (29.2 percent) were employed in the Federal civilian work force in May 1973; 695,000 (29.5 percent) in May 1976.

Although more minorities and women are moving into better paying jobs, they are still underrepresented in mid-level and upper level job grades in most Federal agencies, as well as in various occupations. (See ch. 3.)

ORGANIZATION AND RESOURCES

The way the agencies incorporated the program into their organizational structures and the roles they gave the program were, in some cases, questionable. The Commission had not developed criteria to guide agencies in their decisions on organizational arrangements. (See pp. 44 to 49.)

The Commission was not keeping actual costs of the program although it should. (See p. 43.)

GOALS AND PLANS

Agency plans, including realistic hiring goals and timetables, frequently were not carefully or consistently developed. (See p. 54.) In addition, the Commission did not give agencies the data necessary to develop realistic goals. Each agency had to obtain or develop its own statistics. (See p. 55.) Data on the availability of potentially qualified candidates for Federal employment, particularly minorities and women, was generally outdated, incomplete, and of questionable accuracy. (See p. 55.)

Statistical measurement and information systems of the Commission and other agencies often produced inaccurate, untimely, and unnecessarily duplicative data. (See pp. 54 to 56.) Information on the race and sex of job candidates on Commission employment registers was not being kept. These registers are the primary source of names of applicants for most Federal jobs in the competitive service. (See pp. 59 and 60.)

RECRUITMENT

The emphasis of most agency programs was on setting and meeting only hiring goals. When goals are set, recruiting goals should also be established. (See pp. 54, 60, and 64.) The Commission should become more involved in recruitment programs. (See p. 81.)

EVALUATIONS

Equal employment opportunity plans were often not submitted by the agencies or reviewed and approved by the Commission in a timely manner. Many of the plans sampled--89 percent in 1974, 65 percent in 1975--required revision by the Commission. (See pp. 65 and 66.)

The Commission was inconsistent in requiring organizational levels within agencies to submit plans to the Commission for review. The Commission was reviewing the plans of only about 1,200 out of 4,000 Federal agency organizations conducting equal opportunity programs. The Commission has not stipulated the amount of evaluation required of the agencies. (See pp. 69, 72, and 90.)

AGENCY COMMENTS

During GAO's review, the Commission made or proposed several changes in its regulations. If adequately implemented, these should help to eliminate or lessen some drawbacks of program administration. (See pp. 44, 56, 67, 73, 94, and 99.)

The Commission agreed, in general, with the report and indicated that it was taking or would take necessary corrective actions. (See app. I.)

Similarly the 10 departments and agencies reviewed also agreed, in general, with the report. (See apps. II to X.)

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ABBREVIATIONS

CSC	Civil Service Commission
EEO	equal employment opportunity
FPM	Federal Personnel Manual
GAO	General Accounting Office
GS	General Schedule
VA	Veterans Administration

CHAPTER 1

INTRODUCTION

The Federal Government employs full time over 2.3 million civilians, and each year the Federal personnel system processes over 200,000 new appointments and over 2 million other personnel actions. Responsibility for coordinating this system is vested with the U.S. Civil Service Commission (CSC). CSC defines its merit system as a complete system of personnel selection and management based on an integrated set of personnel policies, procedures, and practices designed to (1) recruit a competent work force, (2) insure a stable work force, and (3) provide equal opportunity for employment.

Federal guidelines for achieving equal employment opportunity (EEO) and insuring nondiscrimination were enacted into law by the Equal Employment Opportunity Act of 1972 (Public Law 92-261, approved March 24, 1972, 86 Stat. 103, 42 U.S.C. 2000e). According to the act, CSC is responsible for

--annually reviewing and approving national and regional EEO plans submitted by each department and agency and

--reviewing and evaluating agency operations of EEO programs and publishing progress reports.

BACKGROUND

It was not until almost 60 years after the Civil Service Act's passage that racial or ethnic discrimination was expressly prohibited in Federal employment. The Ramspeck Act of 1940 provided a statutory ban on discrimination based on race, color, or creed. Shortly before its passage, President Franklin D. Roosevelt issued the first of a series of Executive orders prohibiting racial, ethnic, and religious discrimination in Federal employment. In 1961 President John F. Kennedy issued Executive Order 10925, which established the President's Committee on Equal Employment Opportunity and announced a new emphasis on affirmative action, rather than only on nondiscrimination.

Although the Government was not included in the coverage of Title VII of the Civil Rights Act of 1964, that statute did state that the U.S. policy was to insure nondiscrimination in Federal employment based on race, color, religion, sex, or national orgin.

In 1965, by Executive Order 11246, President Lyndon B. Johnson transferred Federal equal employment enforcement responsibility to CSC. In 1967 he issued Executive Order 11375, which banned sex discrimination in addition to discrimination based on race, color, religion, and national origin in Federal employment. CSC responded to this by establishing the Federal Women's Program to enhance employment and advancement opportunities for women.

In 1969 the Chairman of CSC issued a report to President Richard M. Nixon which identified major problems impairing the equal employment rights of individuals and which required changes in Federal personnel programs. The problems identified in the CSC report were:

--Excessive concentrations of minorities and women at lower grade levels.

--Comparatively few minorities and women entering Government service at the middle level and in professional occupations.

--Inadequate employment of minorities compared to their population in many areas of the country.

--An inefficient system for gathering information to pinpoint problem areas or effectively manage the EEO program.

In response to this report, President Nixon issued Executive Order 11478 on August 8, 1969, and an accompanying memorandum to department and agency heads entitled "Equal Employment Opportunity." The Executive order set forth a new direction for the EEO program and emphasized that each Federal agency was responsible for developing an affirmative action program. The order, as amended, stated that the Government's policy was to (1) provide equal opportunity in Federal employment for all persons, (2) prohibit discrimination in employment because of race, color, religion, sex, or national origin, and (3) promote full equal employment opportunity through a continuing affirmative action program in each executive department and agency. This equal opportunity policy was to apply to, and be an integral part of, every aspect of personnel policy and practice in the employment, development, advancement, and treatment of civilian employees of the Government.

Executive Order 11478 gave CSC authority to guide and oversee EEO programs within Federal departments and agencies. CSC was directed to:

--Review and evaluate agency program operations.

--Obtain necessary data and report to the President on overall progress.

--Issue appropriate regulations, orders, and instructions with which agencies must comply.

--Provide prompt, fair, and impartial consideration of all complaints involving Federal employment discrimination.

--Provide counseling for employees who believe they have been discriminated against and encourage informal resolution of matters.

--Provide for appeals of decisions to CSC following impartial review by the Federal agency involved.

In 1970 President Nixon established the Sixteen-Point Program to assure equal employment opportunities to Spanish-speaking American citizens in the Federal service.

On March 24, 1972, the Congress enacted Public Law 92-261, the Equal Employment Opportunity Act of 1972, which covered Government employees under a provision of the Civil Rights Act of 1964, as amended. A section was added to title VII which required that all personnel actions affecting Federal employees or applicants for employment be free from discrimination and made CSC responsible for enforcing the requirement. CSC was given authority to (1) enforce the 1972 act's provisions through appropriate remedies and (2) issue rules, regulations, orders, and instructions that it considers necessary. Further, each agency head is required to comply with the rules and orders.

Also, CSC is required to

--annually approve national and regional EEO plans (commonly referred to as affirmative action plans) submitted by each agency,

--review and evaluate the operation of agencies' EEO programs, and

--publish periodic reports reflecting the Government's progress in providing EEO.

As an adjunct to EEO requirements, Public Law 93-259, effective May 1, 1974, amended the Age Discrimination in Employment Act of 1967 to include the Government. In implementing the statute, CSC required agencies to establish a continuing program for assuring nondiscrimination because of age and assigned overall coordination and direction to agency EEO directors.

AFFIRMATIVE ACTION PLANNING

CSC has issued a number of implementing regulations and guidelines designed for assisting Federal agencies to meet their EEO responsibilities. A key element in EEO programs is developing and implementing national and regional affirmative action plans. Current CSC regulations (April 30, 1976, Federal Personnel Manual (FPM) letter no. 713-35) provide that in developing EEO plans, agencies should (1) assess the current status of EEO within their organization, (2) identify problem areas, (3) assign objectives and goals, and (4) develop action items to overcome identified problems. The format prescribed by CSC for affirmative action plans contains four major parts: (1) an introduction, (2) a report of accomplishment of the last year's plan, (3) a report assessing the current EEO situation, and (4) a report of objectives and specific actions for the upcoming plan period.

The introduction provides (1) a brief explanation of the agency's organization for carrying out EEO, (2) the functions, roles, and interrelationships of important EEO program officials, (3) the planned personnel and resources allocated to the EEO program, and (4) a certification of the qualifications of principal EEO officials. The report of accomplishment describes the results attained during the previous plan year and indicates whether actions in the last plan were accomplished and, if not, why.

The report of assessment briefly summarizes the results of the agency's assessment of its EEO situation and the EEO problems requiring priority attention and solutions for overcoming identified obstacles to EEO. This section covers: (1) organization and resources, (2) discrimination complaints, (3) recruitment, (4) full utilization of employees' skills and training, (5) upward mobility for lower level employees, (6) supervisory and management commitment, (7) community outreach, and (8) program evaluation.

Finally, the report of objectives and action items contains those goals and actions the agency plans to take during the plan period for solving the problems identified in its assessment. The suggested format includes (1) a brief description of the current situation or problem, (2) one or more objectives which will lead to the problem's resolution, (3) the specific action or actions needed to meet the objectives, (4) the official responsible for carrying out the action, and (5) the deadline for accomplishing the action.

CSC indicates that numerical hiring goals and timetables is a useful management concept to greatly enhance EEO plans; it believes that this concept should be used where it will contribute to the resolution of EEO problems. However, CSC believes affirmative action to attain such goals must be carried out within the context of the merit system and when using goals and timetables, agencies must assure that the plan clearly shows the necessity of achieving these goals through the merit system, not through preferential or discriminatory practices.

Beginning October 1, 1976, plans were to be developed by all agencies and installations on a fiscal year basis and published and implemented by the first day of the fiscal year. Previously, some agencies prepared plans on a fiscal year basis and others on a calendar year basis. Submission dates to CSC for review and approval, however, are determined by agreement between CSC and the agencies. Also, the plan's objectives and action items may cover up to a 4-year period for agencies and major command organizations and up to 2 years for regional plans; previously, plans covered only 1 year for all organizational levels.

CSC has warned agencies that their plans will have to be modified if CSC finds that:

--Problems or improvements needed and identified by either the agency or CSC have not been addressed adequately and in a meaningful or reasonable manner.

--Numerical goals and timetables are inconsistent with appropriate CSC regulations and guidance.

--Goals and timetables are not included where they would be appropriate and useful.

--Regional plans routinely follow national guidance and do not relate to local problems.

--Considerable slippage has occurred in accomplishing objectives and/or action items and there is not enough information to demonstrate the nature and extent of previous efforts.

Federal agencies have EEO programs at their headquarters and at many field offices. Over 90 Federal departments and agencies must submit yearly national EEO plans to CSC; subordinate offices of these agencies submit nearly 1,200 regional plans.

Comprehensive data on the cost of operating EEO programs at the time of our review was not available. However, estimates reported by agencies to CSC indicated that Government-wide allocations for EEO were about $56 million for fiscal year 1972 and about $169 million for fiscal year 1976. Similarly, the amount of time devoted to EEO program activities by agency personnel was estimated at about 2,000 staff-years for fiscal year 1972 and about 10,000 staff-years for 1976. The number of employees serving in full-time permanent EEO positions was estimated at under 1,400 in 1973 but over 2,500 in 1974. At many agencies 10 to 20 or more times as many employees served in part-time EEO positions than full-time jobs.

SCOPE OF REVIEW

In June 1973 the Chairman, Senate Committee on Labor and Public Welfare, requested that we review the implementation of the EEO Act of 1972 as it applied to Federal employees. This report, one of several resulting from the Chairman's request, sets forth the results of our review of selected hiring practices of Federal agencies and of certain other administrative, planning, and evaluation matters relating to EEO. These matters include organization and resources, affirmative action goals and plans, recruitment, and CSC and agency evaluations. (See appendix XIII for a list of our other reports.) We also report our comments on a number of fundamental but controversial issues which we believe will continue to hinder the effectiveness of the EEO program until they are openly discussed and, insofar as possible, resolved. Our review focused largely on the efforts and results of Federal agencies to employ minorities and females.

We conducted our review of EEO program plans and activities through October 1975 at 44 headquarters and field installations of CSC and the following 10 Federal departments and agencies:

1. United States Forest Service
2. Department of the Air Force
3. Social Security Administration
4. United States Fish and Wildlife Service
5. National Park Service
6. United States Customs Service
7. Internal Revenue Service
8. General Services Administration
9. United States Postal Service
10. Veterans Administration

A detailed listing of the locations we visited is in appendix XI.

At these Federal agencies, we reviewed affirmative action plans and planning material, statistics, budget data, internal evaluation reports, correspondence, and other EEO and personnel records pertaining to EEO program planning and implementation and to management procedures. We also interviewed ranking agency officials; officials in the EEO and personnel offices; other agency personnel involved with the EEO program, including counselors and members of EEO committees; and randomly selected managers, supervisors, and nonsupervisory personnel.

We examined CSC's policies and procedures and guidance issued to agencies on pertinent aspects of the EEO program; we also reviewed CSC's affirmative action plan review procedures and results and program evaluation procedures and reports. Because the statistical EEO data on Federal employees at the agencies we reviewed was not very recent or reliable, CSC provided us with statistics on the Federal competitive work force's composition as of May 31, 1973, and February 28, 1975.

We also interviewed placement officials at a number of universities and colleges around the country to obtain their impressions of Federal recruiters and Federal EEO efforts in college recruiting. We reviewed EEO reports, correspondence, and other material sent to us by a number of agency installations which we did not visit.

In March 1976 an advance draft of this report was provided to and discussed with cognizant CSC officials. A finalized draft was formally sent in July 1976 to CSC for specific review and comment and in August 1976 to the other 10 departments and agencies covered by our review for general review and comment. We received responses of the 10 departments and agencies during September through October 1976. CSC's response was not received until February 1977.

CHAPTER 2

NEED TO RESOLVE FUNDAMENTAL ISSUES ON DIRECTION AND PACE OF EEO PROGRAM

The Equal Employment Opportunity Act of 1972 is intended to assure that all personnel actions of Federal agencies are free from discrimination based on race, color, religion, sex, or national origin. The act has resulted in multiple affirmative actions by CSC and by agencies, which are supposed to, among other things,

- --extend the scope and depth of recruitment efforts to fully assure that opportunities for Federal employment are made known to all segments of society and
- --increase the numbers and percentages of minorities and females in the Federal work force, particularly in mid-level and upper level supervisory and professional occupations.

However, we were unable to assess whether the EEO program employment accomplishments were adequate and effective because at the time of our review CSC had no objective bases for establishing what the performance standards should be. (See ch. 9.)

According to CSC, the establishment of numerical hiring goals and timetables by agencies is a "useful management concept" that can significantly enhance EEO plans and should be used where it will contribute to the resolution of EEO problems.

Although CSC believed that numerical hiring goals and timetables would help EEO plans, at the time of our review, CSC provided almost no guidance on how the concept should be implemented and only general guidance on the conditions under which it should be used. While hiring goals are not mandatory, current CSC regulations provide that EEO plans will not be approved if they do not contain goals and timetables "where circumstances clearly indicate that they would be appropriate and useful." The circumstances referred to, however, are vague; CSC states that employment goals should be established "in problem areas where progress is recognized as necessary" and

> "where employment of minorities and women is less than what should be reasonably expected in view of their representation in area labor forces and recruiting areas."

In our opinion, these generalities, along with the lack of complete, current, and reliable labor force and other statistics, have made it difficult or impossible for agencies to establish appropriate goals and for CSC to evaluate them. (See ch. 5.)

In addition to these problems, there are a number of other interrelated matters or questions concerning the effectiveness of the Government's EEO efforts; but persons responsible for and/or involved in EEO program planning and implementation hold differing, and often conflicting, views. Since our examination was directed primarily to hiring and selected matters of program administration, we did not make an indepth review of most of the other subjects discussed in this chapter. However, these problems, which are of importance and controversy, cause so much of the dilemma we observed that some observations are appropriate.

These problems, as outlined in the remainder of this chpater, are largely derived from the perceptions of EEO and personnel managers and other management officials of the agencies and locations included in our review.

BASIC PURPOSE OF EEO

We find three different perceptions of what the basic thrust of "equal employment opportunity" is or should be.

1. The abstract concepts of treating everyone equally, making affirmative efforts to eliminate discriminatory attitudes and actions of people and systems, and insuring that no discriminatory personnel actions occur. These concepts are stated in legislation and Executive orders and in many agency policy statements and emphasize the word "equal" in the phrase "equal employment opportunity."

2. The somewhat more specific concept, which is in many CSC documents and other agency policy and commitment statements, of making certain that opportunities for Federal employment are known to all segments of society and that all employment sources are fully tapped. In this concept, the word "opportunity" is emphasized.

3. The very specific concept of increasing the numbers and percentages of minorities and women in agency work forces (generally in all occupations and at all grade levels) to a predetermined specific level, to a "parity" or proportional representation level, or to an unspecified "equity" or "reasonable" level. This concept, which appeared to be characteristic

of the operating approach used by most agency organizations we reviewed, heavily emphasizes the word "employment" in the phrase "equal employment opportunity."

These differences, which may seem semantic or nonexistent, have caused problems for many agencies when they attempt to structure and conduct an EEO program. Not discriminating against any person or group of persons while trying to increase the proportions of minorities and women in the work force can create a dichotomy; this is compounded by relatively low employee turnover, low hiring rates, and a plentiful supply of candidates already on CSC registers. These different interpretations of the fundamental objective of EEO are also interrelated with the following issues.

INTENDED BENEFICIARIES OF THE EEO PROGRAM

Is EEO really for all persons, or is it primarily a remedial, catch-up program for minorities and women? The answer to this question and similar questions relating to the principal target group of the EEO effort does not appear to be clear or generally agreed upon, but the direction and the pace of an agency's EEO program are largely contingent on one answer or the other. While an EEO program can be conducted to treat everyone equally and, in doing so, result in the employment of a greater proportion of minorities and women, it can also, if management desires or interprets it as appropriate, be conducted with a focused effort toward catching up for past underemployment of minorities and women; this would result in the employment of a disproportionately greater number of members of these groups than under the equal treatment approach.

Our discussions and observations indicated that some agencies believed in and were using an equal treatment approach; others appeared to be committed to remedying the past effects of underemployment through a catch-up program.

EFFORTS VERSUS RESULTS

Is it the efforts an agency makes or the results it achieves that counts? For example, does an agency organization conform with statutory and regulatory requirements and satisfy the desires of higher agency levels and CSC if it makes a good-faith, affirmative effort to increase the intake and distribution of minorities and females but achieves little or no results? Conversely, is an EEO program effective if an agency organization achieves considerable results in hiring and promoting minorities and females with little or no positive effort?

Here again, we found differences in the ways that agency officials personally viewed the matter. Perhaps more importantly, we found differences in the ways that agency officials perceived the views of CSC. Some officials felt that CSC was interested primarily in the efforts made and pointed out CSC's (1) emphasis in policy statements, regulations, reviews of EEO plans, and personnel management evaluations on "spreading the word" about Federal employment, (2) tapping all available sources of potentially well-qualified candidates, and (3) otherwise making a good-faith effort to expand employment opportunities. On the other hand, some officials felt that CSC was really concerned principally with results obtained as evidenced by its publishing statistics on numerical gains in employment and having agencies establish and achieve numerical goals. Many other agency personnel, however, said that these differing opinions showed that CSC was ambivalent or contradictory by articulating one approach but practicing another.

Similarly, we found considerable differences in importance of goal achievement between headquarters and field staff officials even within an agency. In the majority of cases, we observed that the more indepth the program became, the more compelled the implementing officials felt to achieve results and meet established employment goals, sometimes through techniques that were not intended or later condoned by higher level officials.

In our opinion these contrasting perceptions can cause unwarranted differences in operating practices as well as unproductive tenseness in program officials and other organization employees. These perceptions stem, in part, from a lack of clear policy and objectives guidance from CSC and higher agency levels and, in part, from a failure to clearly communicate or seek clarification of existing policies.

GOALS VERSUS QUOTAS

When is a numerical employment target or objective a goal, which is permissible, and when is it a quota, which is not?

The most widely cited distinction between goals and quotas is contained in a March 23, 1973, policy memorandum of agreement signed by the Chairmen of the Civil Service Commission and Equal Employment Opportunity Commission; the Assistant Attorney General; and the Acting Director, Office of Federal Contract Compliance, Department of Labor. The document states:

> "A quota system, applied in the employment context, would impose a fixed number or percentage which must be attained, or which cannot be exceeded; the crucial consideration would be whether the mandatory numbers of persons have been hired or promoted. Under such a quota system, that number would be fixed to reflect the population in the area, or some other numerical base, regardless of the number of potential applicants who meet necessary qualifications. If the employer failed, he would be subject to sanction. * * *"

Conversely, the memorandum defines a goal as follows:

> "A goal, on the other hand, is a numerical objective, fixed realistically in terms of the number of vacancies expected, and the number of qualified applicants available in the relevant job market. Thus, if through no fault of the employer, he has fewer vacancies than expected, he is not subject to sanction, because he is not expected to displace existing employees or to hire unneeded employees to meet his goal. Similarly, if he has demonstrated every good faith effort to include persons from the group which was the object of discrimination into the group being considered for selection, but has been unable to do so in sufficient numbers to meet his goal, he is not subject to sanction."

Thus, as defined above, quotas

--are set arbitrarily;

--are set without regard to potential vacancies, supply of qualified candidates, and other employment conditions;

--are required to be met or cannot be exceeded; and

--result in sanctions if not achieved, regardless of reason.

Goals, on the other hand, by definition

--are developed realistically;

--are developed with regard to potential vacancies, supply of qualified candidates, and other employment conditions;

--are not required to be met, or can be exceeded, if actual employment conditions differ from those anticipated; and

--do not result in sanctions if not achieved, if good-faith efforts are made.

However, it appears that these definitions are of limited practical value in making distinctions between permissible goals and impermissible quotas. For one reason, the definitions cover a number of conditions which are at the opposite ends of a spectrum but which, in practice, are more likely to exist anywhere between the two extremes. For example, we found that agencies were much more likely to partially consider or analyze anticipated vacancies and the pool of potential candidates than to either ignore these or fully stress them. Likewise, numerical employment objectives are generally not totally arbitrary or totally realistic but somewhere in between; they may be required to be met for some groups of applicants or occupational categories, but not for others; they may result in sanctions if not achieved under certain conditions or for certain reasons, but not for others; or failure to achieve the numerical objectives may result not in penalty sanctions but in some lesser measure or other action. In all of these situations, an employment objective is neither a goal nor a quota, since the agency's practice would not meet the definition of either.

For another reason, the several opposing conditions which distinguish a goal from a quota are, individually, mutually exclusive but are not necessarily practiced on an "all or none" basis by a given agency. That is, an employment objective may be set arbitrarily (quota) but not be required to be met (goal). Or it may be developed realistically with full consideration of anticipated vacancies and the potential supply of qualified candidates (goals) but then be required to be met (quota). In these and similar situations, an employment objective is, by definition, neither a goal nor a quota, since it contains some of the features of each.

The matter of "goals versus quotas" evoked a great deal of discussion among agency officials and other employees we spoke to. Generally, EEO personnel regarded any numerical employment objective as a bona fide goal, a view not always shared by other agency personnel. Many personnel, including some line managers, supervisors, and higher level officials, said that while they grudgingly accepted the numerical employment objectives and the methods used to try to achieve them, they believed the objectives to be, at best, disguised quotas. Some of these personnel seemed to be concerned not so much with the numerical figure itself but with the process used to set it; comments included descriptions such as "arbitrary," "pulled from thin air," "no relationship to reality," and "not based on a statistical analysis." They were also concerned with the process used to meet it; comments included descriptions such as "overzealous efforts," "efforts limited to minorities and females," "reverse discrimination." Conversely other agency officials and employees believed that numerical targets (1) were set too low, (2) did not sufficiently reflect the hiring opportunities available, (3) were "whitewash" or "tokenism," and (4) were not aggressively pursued in the recruiting and hiring processes.

It seems evident that goal setting's concept and process have limited credibility among Federal employees and need clarifying and improving.

OTHER ISSUES

In addition to the above issues, a number of equally controversial, fundamental problems which affect the direction and pace of the Government's EEO efforts came to our attention. Program objectives and administrative issues follow.

Defining and measuring underrepresentation

What is underrepresenting or underemploying a class or group of persons and how is it measured? If underrepresentation is to be remedied, at what level does representation occur? Does it occur (1) at a level proportional to the population or the work force? (2) at a level that is equitable or reasonable? (3) at some other level? Do statistics, other data, and evaluative techniques exist to make appropriate determinations?

Short-term versus long-term EEO progress

Can considerable progress in employing and promoting more minorities and women be made in the short term--year by year--or is a long-term view--many years--a more realistic expectation?

Achievement of EEO

Can EEO ever, as a practical matter, be achieved? If so, at what point and by whose reckoning? And if so, will there still be a continuing need for an EEO program? What do agencies do when they have achieved their long-range goals? If EEO is not a closed-end type of program that can be ultimately achieved, will the program continue to grow along current lines or must it change in important respects?

Meeting goals and timetables for affirmative action

Are there unwarranted pressures, actual or perceived, for meeting EEO goals and timetables for hiring women and minorities? If so, what is the source of these pressures and what problems are resulting? Conversely, is there insufficient commitment and official stimulation toward encouraging the achievement of goals and timetables? If so, what steps should be taken to create or intensify the urgency and remedy the problem? Should goals and timetables be set, if appropriate, for nonminorities and/or for males? When would it be appropriate?

Reverse discrimination

What does reverse discrimination mean and is it occurring? Is it wrong? Is it causing morale or other problems? What can or should be done? By whom?

Conflict between merit and EEO

Are EEO program objectives and efforts in conflict with merit system procedures and practices (as opposed to merit principles), other CSC regulations, or other provisions of law? If so, what adverse effects are occurring? Can or should steps be taken to eliminate or minimize the conflicts without degrading EEO or merit objectives? How does the issue of veterans' preference relate to and affect EEO issues?

Cohesiveness of the EEO effort

Are there too many special emphasis groups, such as minorities, Spanish-surnamed minorities, women, handicapped, and aged, each with its separate share of EEO program emphasis? If so, do the efforts in behalf of these separate groups often conflict, and do they fragment and diffuse the effectiveness that a more unified EEO effort might have?

Composition of EEO staffs

Are minorities and women dominating EEO policy or program positions? If so, is this causing credibility problems or other difficulties? Should EEO staffs be equitably integrated or does their advocacy role require a concentration of members of special emphasis groups? How about staff compositions in personnel offices?

Integration versus separation of EEO and personnel functions

Should EEO and personnel organizations and responsibilities within an agency be combined or kept separated? What are the trade-offs? Under what conditions is integration or separation the better approach?

Differences in approach by Federal enforcement agencies

Why are there differences in requirements and enforcement procedures between CSC and other Federal agencies having oversight and enforcement responsibility for aspects of the Government's internal and external EEO efforts? Are these differences causing problems which should be avoided? If so, what steps should be taken to eliminate the unwarranted differences and make the Government's regulatory and enforcement effort more unified and consistent?

CHAPTER 3

FEMALE AND MINORITY HIRING

Federal agencies, through their affirmative action programs, have made efforts to increase the numbers of women and minorities in their work forces and have achieved some success. We could not determine the reasonableness or adequacy of this progress in relation to employment opportunities, however, because adequate data on the potential supply of qualified applicants was generally not available. This difficulty in evaluating the EEO program is fully discussed in chapter 9.

Success within the agencies has not been uniformly achieved; some minority groups as well as some agencies have not done as well as others. Also, in spite of achievements, there are still large concentrations of women and minorities at lower grade levels and relatively few in professional and managerial occupations.

Agencies 1/ face several barriers in their efforts to attract and hire women and minorities, such as the

--limited number of job openings and, consequently, limited demand for new employees;

--limited supply of qualified women and minority applicants for certain occupations; and

--constraints in the Federal hiring process.

DESCRIPTION OF EMPLOYEE DATA BASE

Because of the limitations on the statistical information available at the agencies we reviewed and statistics published routinely by CSC, much of this chapter is based on data on all Federal civilian employees for May 31, 1973, through February 28, 1975; this data was specifically provided to us by CSC from its computer data base. Before using the data, we omitted the records on Aleut and Eskimo employees (since such records are kept only for employees in Alaska) and those employees stationed outside the United

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1/An agency refers to any department or independent establishment of the Government.

States; then we edited the data for completeness of race, sex, and other characteristics. After the latter edit, we excluded the records of 181,000 employees from 2,393,000 in the May 1973 data base and 81,000 from 2,692,000 in the February 1975 data base. Also, we had to exclude 152,000 records from 2,599,000 personnel actions (such as accessions, promotions, and separations which occurred during the 21 months from May 1973 through February 1975). Consequently, the numbers and percentages indicate general trends but are not completely reconcilable.

The majority of exclusions were due to incomplete or erroneous data. For example, about 145,000 employee records in the May 1973 data had an erroneous or missing minority group designation; about 35,000 others had an erroneous or missing sex, occupational, salary, or grade level designation. These exclusions are explained in chapter 9.

The following section covers all Federal employees 1/ stationed in the United States for whom complete data was available. Minority data represents the members of the four largest minority groups--Blacks, Spanish-surnamed, American Indians, and Orientals.

WOMEN AND MINORITIES EMPLOYED BY PAY PLAN

From May 1973 to February 1975, the women in the Federal work force increased from 29.2 percent to 30.8 percent, while minorities decreased from 21.4 percent to 21.1 percent.

1/Includes full-time, part-time, and intermittent employees in permanent or temporary positions.

Total Women and Minorities by Pay Plan In Work Force as of May 31, 1973, and February 28, 1975 (note a)

Pay plan	May 31, 1973			February 28, 1975		
	Total work force	Percentage of women	Percentage of minorities	Total work force	Percentage of women	Percentage of minorities
General schedule (GS)	1,083,023	42.1	17.4	1,340,357	42.6	17.3
Wage grade	331,005	9.3	32.9	364,682	9.2	31.2
Wage leader	11,964	5.2	26.3	13,711	5.5	26.4
Wage supervisor	34,143	2.8	18.4	39,136	2.9	19.5
Other wage systems	32,984	8.8	28.6	34,330	11.6	31.2
Other pay plans	88,777	45.9	19.8	117,013	45.9	19.0
Postal Service	639,130	18.2	22.2	701,380	19.9	23.0
Total	2,212,026	29.2	21.4	2,610,609	30.8	21.1

a/Minority females appear in both the women and minorities columns.

While the total Federal work force increased in all of the pay plans,

--women increased their representation in five of the pay plans and decreased in one and

--minorities increased their representation in four pay plans and decreased in three.

Minority groups vary in gains

Although all minority employee groups we reviewed increased in numbers, they did not all increase in their proportions to the total Federal work force. Blacks had the largest numerical gains (51,410), but they declined in percentage representation, while the Spanish-surnamed made the largest gain in representation.

The following table shows the numbers and percentages of jobs held by members of the four largest minority groups as of May 1973 and February 1975.

Representation of Minority groups in the Work Force as of May 31, 1973, and February 28, 1975

	May 31, 1973		February 28, 1975	
	Number	Percent in work force	Number	Percent in work force
Black	366,292	16.6	417,702	16.0
Spanish-surnamed	69,488	3.1	86,681	3.3
American Indian	19,005	0.9	23,474	0.9
Oriental	18,293	0.8	23,486	0.9
Total	473,078	21.4	551,343	21.1

Accessions and separations of women and minorities

For the 21-month period, May 31, 1973, to February 28, 1975, women and minorities comprised a greater proportion of the accessions 1/ than their proportions to the work force at the beginning of the period. Women comprised about 41 percent and minorities about 25 percent of the accessions, and, as of May 31, 1973, women comprised about 29 percent and minorities 21 percent of the total Federal work force.

During this same period, women comprised about 38 percent of the separations 2/ from Federal employment, which was about 3 percent less than their proportion of accessions. However, minorities accounted for about 25 percent of the separations; this was the same as their proportion of the accessions.

The following table shows the accessions and separations for May 31, 1973, to February 28, 1975.

1/A personnel action which results in adding an employee to the work force of a department or agency. Accessions include new hires, transfers-in, reappointments, return to duty, and reinstatements.

2/A personnel action which results in the loss of an employee from the active work force of the department or agency. Separations include such actions as retirements, resignations, transfers-out, disabilities, and abandonments.

Accessions and Separation of Women and Minorities by Pay Plan May 31, 1973, to February 28, 1975 (note a)

Pay plan	Women				Minorities			
	Accessions		Separations		Accessions		Separations	
	Number	Percentage of total	Number	Percentage of total	Number	Percentage of total	Number	Percentage of total
General schedule	255,118	55.0	197,071	51.7	91,511	19.7	69,018	18.1
Wage grade	14,197	10.0	13,863	10.7	38,186	27.0	36,900	28.5
Wage leader	9	1.6	138	5.3	152	26.2	545	20.8
Wage supervisor	7	0.8	194	2.6	139	16.2	1,018	13.7
Other wage systems	784	6.0	793	6.5	3,712	28.7	3,906	32.1
Other pay plans	70,994	45.8	56,800	45.1	47,400	30.6	40,217	31.9
Postal Service	51,144	29.2	44,284	27.9	55,637	31.7	50,340	31.8
Total	392,253	41.3	313,143	38.3	236,737	24.9	201,944	24.7

a/Minority women appear in both the women and minorities columns.

Representation varies at individual agencies

In 1973, women comprised 29 percent of the total Federal work force and minorities comprised 21 percent. However, they were not uniformly represented in each of the Federal agencies.

CSC studies show that in 1973, for agencies with over 5,000 full-time white collar employees, the proportions of women ranged from 60 percent to 14 percent. The proportions of minorities in agencies with over 5,000 employees of all types ranged from 53 percent to 6 percent.

For the 10 departments and agencies we reviewed, the proportions of women employed in 1974 or 1975 ranged from 68 percent to 19 percent of the work forces; minorities ranged from 41 percent to 6 percent. These differences were as follows.

Percentage of Women and Minorities at Agencies Reviewed (note a)

Department/ agency	Total civilian employment	Percent of	
		Women	Minorities
Air Force	232,189	29.7	17.5
Forest Service	19,330	18.6	5.8
General Service Administration	37,252	32.0	40.9
Internal Revenue Service	77,161	49.5	16.1
National Park Service	4,709	28.9	10.3
Social Security Administration	77,133	68.0	29.7
Customs Service	13,547	24.8	17.8
Postal Service	647,607	19.3	23.7
Fish and Wildlife Service	4,359	29.0	6.1
Veterans Administration	184,496	51.0	30.0

a/Minority women appear in both the women and minorities columns.

There was an even greater discrepancy at the 27 field installations we reviewed. At these sites, proportions of women ranged from 87 percent to 13 percent of the work forces; minorities ranged from 67 percent to 2 percent.

Women and minorities gain in higher paying jobs

Modest gains have been made by minorities and women in both the numbers of mid-level and upper level jobs 1/ they hold and their proportions of these jobs. These increases have been due primarily to promotions rather than to mid-level and upper level hires. Despite these successes, women and minorities are still overrepresented in the lower paying jobs and underrepresented in the higher paying jobs. The following table shows the grade level groupings of women and minorities for all pay plans as of May 1973 and February 1975.

1/For purposes of analysis, we defined the jobs as follows.

- --Lower level jobs--GS-1 to -6, wage system 1 to 6, and other pay systems up to $8,999.
- --Mid-level jobs--GS-7 to -13, wage system 7 to 12, and other pay systems from $9,000 to $18,999.
- --Upper level jobs--GS-14 to -18, wage system 13 and higher, and other pay systems of $19,000 and up.

Women and Minority Employees by Pay Plan

and Grade or Salary Groupings

as of May 31, 1973, and February 28, 1975 (note a)

	Women				Minorities			
	May 31, 1973		Feb. 28, 1975		May 31, 1973		Feb. 28, 1975	
Pay plan and level	Number	Percent total work force	Number	Percent total work force	Number	Percent total work force	Number	Percent total work force
GS								
1-- 6	344.438	72.6	426.594	71.9	128.962	27.2	153.638	25.9
7--13	109.418	20.1	141.455	21.0	56.230	10.3	74.498	11.1
14--18	2.045	3.2	2,783	3.8	2,864	4.5	3.747	5.0
Other	4	40.0	5	45.4	1	10.0	6	54.6
Total	455,905	42.1	570,837	42.6	188,057	17.4	231,889	17.3
Wage systems								
1-- 6	27,498	19.9	29,960	20.0	70,586	51.1	71,788	48.0
7--12	4.840	2.1	5.655	2.2	47.709	20.5	52,533	20.3
13 and higher	9	0.1	8	0.1	411	5.5	535	6.1
Other	-	-	-	-	19	8.4	1	33.3
Total	32,347	8.6	35,623	8.5	118,725	31.4	124,857	29.9
Other wage systems								
Up through $8.999	1,775	18.6	1.492	22.2	4,438	46.5	2.506	37.2
$9,000--$18,999	1,118	4.8	2,487	9.7	4,946	21.4	8,009	31.3
$19,000 and up	-	-	6	0.3	39	11.6	208	10.5
Total	2,893	8.8	3,985	11.6	9,423	28.6	10,723	31.2
Other pay plans								
Up thru $8,999	18,425	62.4	22,067	56.1	11,000	37.2	12,921	32.8
$9,000--$18,999	20,617	55.9	28,204	58.8	4,951	13.4	7,042	14.7
$19,000 and up	1,726	7.7	3,439	11.6	1,594	7.1	2,237	7.5
Total	40,768	45.9	53,710	45.9	17,545	19.8	22,200	19.0
Postal Service								
Up thru $8.999	30.760	28.2	7,232	29.6	31,269	28.7	1.424	5.8
$9.000--$18,999	83,802	16.2	131,866	19.9	107,810	20.9	158,982	24.0
$19,000 and up	66	1.9	356	2.4	249	7.0	1,268	8.7
Total	114.628	18.2	139.454	19.9	139.328	22.2	161,674	23.0
Total all pay plans	646,541		803.609		473,078		551,343	
Average all pay plans		29.2		30.8		21.4		21.1

a/Minority women appear in both the women and minority columns.

Promotions

Women and minorities have made gains in obtaining higher paying jobs through promotions. From May 1973 through February 1975, both received a greater proportion of promotions at mid-levels and upper levels than their proportions of the work force at these levels.

The following table shows the promotions awarded to women and minorities for May 1973 through February 1975.

Promotions Achieved by Women and Minorities
May 31, 1973, to February 28, 1975 (note a)

		Women			Minorities		
All pay plans	Total promotions	Number of promotions	Percentage of total	Percentage of work force	Number of promotions	Percentage of total	Percentage of work force
Lower level	273,667	189,085	69.1	55.6	79,681	29.1	32.4
Mid-level	378,083	81,793	21.6	16.2	64,940	17.2	16.4
Upper level	27,940	1,282	4.6	4.0	2,276	8.1	5.3
Total	679,690	272,160	40.0	29.2	146,897	21.6	21.4

a/Minority women appear in both the women and minority columns.

Mid-level and upper level hires

From May 1973 to February 1975, several thousand newly hired women and minorities entered Federal employment in mid-level jobs and a few hundred entered in upper level jobs. However, these new employees did not increase the proportions of women and minorities at these levels. In the majority of cases, women's and minorities' proportions of new hires at mid-level and upper levels were less than their proportions of the total work force at these levels as of May 1973.

For example, women's and minorities' proportions of mid-levels new hires exceeded their proportions of the work force in only one of the five pay plans or pay plan groupings we used. For upper level new employees, they exceeded work force proportions in three of the five pay plans. However, total upper level employees during the period were only 89 women and 118 minorities.

The following table shows the number of newly hired women and minorities, contrasted with their portions of the work force.

Women and Minority New Hires by Pay Plan and Grade Grouping for May 31, 1973, to February 28, 1975, and Comparison to May 31, 1973, Work Force (note a)

	Women			Minorities		
		New hires From May 31, 1973, to Feb. 28, 1975			New hires From May 31, 1973, to Feb. 28, 1975	
Pay plan	Percent of work force as of May 31, 1973	Number	Percentage of total	Percent of work force as of May 31, 1973	Number	Percentage of total
GS						
1--6	72.6	135,875	71.4	27.2	41,858	22.0
7--13	20.1	8,298	19.8	10.3	3,963	9.4
14--18	3.2	72	6.6	4.5	73	6.7
Total		144,245			45,894	
Average	42.1		61.8	17.4		19.7
Wage system						
1--6	19.9	10,284	17.7	51.1	19,171	33.0
7--12	2.1	356	1.2	20.5	3,624	12.3
13 and higher	0.1	-	-	5.5	1	1.6
Total		10,640			22,796	
Average	8.6		12.2	31.4		26.0
Other wage systems						
Up thru $8,999	18.6	510	12.2	46.5	910	21.7
$9,000--$18,999	4.8	23	1.9	21.4	136	11.4
$19,000 and up	-	-	-	11.6	7	9.2
Total		533			1,053	
Average	8.8		9.8	28.6		19.3
Other pay plans						
Up thru $8,999	62.4	1,179	63.6	37.2	603	32.5
$9,000--$18,999	55.9	156	9.8	13.4	96	6.0
$19,000 and up	7.7	8	7.9	7.1	12	11.9
Total		1,343			711	
Average	45.9		37.9	19.8		20.1
Postal Service						
Up thru $8,999	28.2	7,325	25.4	28.7	9,933	34.4
$9,000--$18,999	16.2	35,481	29.7	20.9	37,880	31.7
$19,000 and up	1.9	9	3.4	7.0	25	9.6
Total		42,815			47,838	
Average	18.2		28.8	22.2		32.2
Total all pay plans		199,576			118,292	
Average all pay plans	29.2		41.7	21.4		24.7

a/Minority women appear in both the women and minorities columns.

BARRIERS TO EEO PROGRESS

We noted several factors which limited the ability of Federal agencies to attract and hire qualified minorities and females. These factors are not a rationale for agency inaction, but, in certain cases, they are legitimate barriers to early EEO program success.

In our opinion, the more serious barriers are the

--limited demand for new employees,

--limited supply of qualified women and minority applicants for certain occupations, and

--constraints in the Federal hiring process.

We did not address barriers in the CSC process of testing and examining applicants for employment. This is the subject of an ongoing review by us.

Limited demand

Federal agencies cannot achieve EEO program success by simply increasing the size of their staffs and hiring mostly women and minorities for the new positions. Agencies, with minor exceptions, are subject to employment ceilings and, barring changes in mission or other restrictions affecting staff levels, usually hire only in case of retirements, resignations, transfers, or deaths. Officials at most of the agencies reviewed reported that they did not know of any instances when authorized positions or ceilings had been increased to help achieve EEO goals.

Overall Federal hiring has been decreasing, and indications are that this trend will continue. For example, in February 1976 CSC reported that (1) during fiscal year 1975, total Federal hiring was down 17 percent (to 192,625) from the high level of the previous year, (2) competition for most Federal jobs had been keen, and the decline in competitive hiring had continued during the first 6 months of fiscal year 1976, and (3) forecasts for the remainder of the fiscal year were that selections would be 5 to 10 percent below fiscal year 1975, and that, unlike the previous year, the decrease in hiring was reflected to some extent in all occupations and grade levels.

Individual agencies varied in their experiences. For example, the number of employees had increased in 7 [1] and decreased in 3 [2] of the 10 agencies we reviewed. (The periods covered by the the statistics varied somewhat from agency to agency.) The Social Security Administration, the agency with the largest gain (20,662) in employees, had been assigned additional responsibilities which required large numbers of new employees. The Air Force reported that it has had extensive work force reductions, hiring restrictions, and personnel freezes; its total employment declined by over 38,000 employees. An official of the National Park Service reported that it had been under a hiring freeze; this agency's total employment in 1973 was 6,585 and in 1975 was 6,544.

Generally, for any kind of work performed in private industry, there is a counterpart in the Federal work force. Each agency's needs, however, are somewhat unique. As agencies' missions differ, so do their needs for occupational skills. Some agencies use large numbers of the more highly paid professional and managerial skills; other agencies use large numbers of clerical or service skills. The Federal white collar work force is composed of several hundred specific occupations, grouped into 23 occupational groups. There is a wide variance in the professional and nonprofessional occupations in each occupational group.

Limited supply of qualified women and minority applicants for certain occupations

At most of the installations we visited, officials reported that they had difficulties locating women or minorities qualified in the needed professional disciplines. Several reported that there were either no women or minorities on the CSC registers from which they hired or that those on the registers were not "reachable;" that is their examination scores were not high enough for them to be certified to requesting agencies and considered for employment. We could not confirm this because eligible candidates on CSC registers were not identified by race or sex. (See ch. 9).

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[1] Customs; Fish and Wildlife Service; Forest Service; Internal Revenue Service; Postal Service; Social Security Administration; Veterans Administration.

[2] Air Force; General Services Administration; National Park Service.

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Data which might have indicated the numbers of women and minorities that could reasonably be qualified for Federal professional and managerial jobs was outdated and incomplete (See ch. 9.) For example, the most recent data on the civilian labor force was from the 1970 U.S. Census and did not include American Indians or Orientals; and there was no comprehensive data on minority college graduates.

Available demographic data on labor supply or potential labor supply indicated that there were limited numbers of qualified women and minorities for some of the occupations. However, overall conclusions should not be formed through using this data because, as previously stated, it was generally outdated and incomplete.

The most common data source used by the agencies we reviewed for assessing the labor supply was from the U.S. Census of 1970. CSC, however, reported that Census Bureau minority and occupational definitions for the population at large differed from those used by CSC to describe the Federal civilian employment population.

The Census Bureau reported there were about 11.4 million people in the civilian labor force in professional, technical, and related occupations. Of these, about 4.6 million (40 percent) were women, 611,000 (5 percent) were Blacks, and 264,000 (2 percent) were Spanish-surnamed. The census did not provide data on American Indians or Asian Americans.

We selected several Federal professional occupations and determined the representation of women, Blacks, and Spanish-surnamed in comparable occupations in the civilian labor force. Generally, their representation was limited in these occupations; women ranged from 1.6 percent of engineers to 34.9 percent of the biological scientists, Blacks ranged from 1.1 percent of the engineers to 5.1 percent of the biological scientists, and Spanish-surnamed comprised from 1.5 percent of the attorneys to 2.9 percent of the architects.

The following table shows these occupations and the representation of women, Blacks, and Spanish-surnamed in the civilian labor force.

Representation of Women, Blacks, and Spanish-Surnamed in Selected Professional Occupations

Federal professional occupations	Total Federal employees as of October 1973	Civilian labor force in 1970						
			Women		Black		Spanish-surnamed	
		Total	Number	Percentage	Number	Percentage	Number	Percentage
Accountants	20,016	703,546	182,945	26.0	16,521	2.3	15,158	2.2
Architects	2,941	56,214	1,981	3.5	1,258	2.2	1,622	2.9
Chemists	7,966	108,486	12,887	11.9	3,957	3.6	2,496	2.3
Engineers	81,867	1,207,509	19,577	1.6	13,679	1.1	25,330	2.1
Attorneys	11,805	260,152	12,311	4.7	3,379	1.3	3,775	1.5
Biological scientists	3,006	29,380	10,254	34.9	1,498	5.1	737	2.5

In contrast to those occupations with limited percentages of women and minorities, other civilian labor force occupations had large percentages of them. However, the actual numbers of women and minorities in some of these other Federal occupations were quite small because of the relatively limited number of total Federal jobs. For example:

--There were only 26,579 employees in the entire Federal education occupational group, while the civilian labor force had 1.8 million women, 218,000 Blacks, and 50,000 Spanish-surnamed teachers in pre-school, elementary, secondary, and adult education.

--There were 3,178 librarians in the Federal work force while the civilian labor force had about 100,000 women, 8,000 Blacks, and 2,000 Spanish-surnamed librarians.

Although college is a major source of employees for Federal professional and managerial jobs and more women and minorities are receiving college degrees, they still have limited representation in many academic disciplines leading to professional jobs. We could not obtain complete, current data with which to evaluate changes, but we believe that the data that was available indicates trends of female and minority participation in higher education. There was considerably more information available on the status of women than of minorities.

The number of women receiving college degrees 1/ has steadily increased from about 274,000 (38 percent of all degrees) in 1966 to 494,000 (42 percent of all degrees) in 1972. There are more women in fields of study where representation has been and still is comparatively limited. For example, from July 1969 to June 1972, women increased their share of degrees in architecture from 5 to 13 percent and in computer sciences, from 11 to 13 percent.

Many women, though, still received degrees in fields of study where they were already heavily represented. For example, nearly half of all degrees received by women in 1972 were in education, the health professions, and library science--over 65 percent of the degrees were received by women.

1/Includes bachelors, masters, and doctoral degrees.

The following table shows, for selected fields of study, the number of degrees received by women, their percentage of total degrees awarded, and changes from July 1969 through June 1972. These fields represent about 58 percent of all degrees conferred during the period.

Degrees Awarded to Women in
Selected Fields of Study
from July 1969 to June 1972

Field of study	July 1969 to June 1970		July 1970 to June 1971		July 1971 to June 1972		Change for period increase (decrease)	
	Number degrees	Percentage of total	Number degrees	Percentage of total	Number degrees	Percentage of total	Number	Percentage
Agriculture and natural resources	618	5.4	711	4.4	953	5.6	335	0.2
Architecture	248	5.4	903	12.4	1,053	12.6	805	7.2
Biological science	12,827	27.4	12,928	28.7	13,606	28.9	779	1.5
Business and management	10,287	8.0	11,528	8.1	12,813	8.4	2,526	0.4
Computer science	336	10.8	491	12.0	698	12.6	362	1.8
Chemistry	2,760	17.4	2,649	17.4	2,711	18.6	(49)	1.2
Education	170,160	67.5	182,654	67.2	199,453	67.4	29,293	(0.1)
Engineering	534	0.8	608	0.9	820	1.1	286	0.3
Health professions	19,577	72.8	22,697	72.2	25,752	71.0	6,175	(1.8)
Library science	6,420	84.1	6,633	82.4	6,850	81.2	430	(2.9)
Mathematics	12,087	35.1	11,043	35.4	10,891	36.3	(1,196)	1.2

The majority of all degree recipients entered the job market. A Bureau of Labor Statistics report showed that 751,000 persons receiving degrees in 1972 were in the labor force and, as of October 1972, 681,000 (91 percent) were employed. Of these 681,000, about 267,000 (39 percent) were women, and, of these employed women, about 191,000 (72 percent) worked in the following professional and technical occupations.

Women Degree Recipients Employed in Professional and Technical Occupations in 1972

Occupation	Number of women	Percentage of total
Engineers	1,068	3.5
Health occupations	25,365	65.3
Social scientists	1.068	14.2
College and university teachers	2,937	11.3
Non-college teachers	121,752	60.0
Other	38,448	34.8

As shown above, women received most of the degrees in the health and non-college teaching fields. Although the percentage of women among newly hired engineers was small (3.5 percent), it was greater than the engineering degrees conferred to women in 1972 (1.1 percent) or their representation as engineers in the 1970 civilian labor force (1.6 percent).

Information on the status of minorities in higher education was also incomplete and dated. Data was available on minority enrollment in institutions of higher education, but there was little information available on graduates. A Bureau of Labor Statistics publication reported that minorities comprised about 31,000 (4 percent) of the 873,000 students who completed requirements for bachelor or higher degrees in the year ended June 1972. The following is a summary of available data on minorities enrolled in institutions of higher education, their degrees, and their fields of study.

There has been a great increase in the numbers of minorities enrolled in institutions of higher education. Statistics published by the Office for Civil Rights, Department of Health, Education, and Welfare, showed that minority enrollments increased about 144 percent from 1968 to 1972. The following table shows enrollments 1/ as of 1968, 1970, and 1972.

1/Enrollments may be slightly understated because the study did not include schools which did not receive Federal aid or which did not respond to the Office for Civil Rights survey.

Comparative Enrollment in Institutions of Higher Education by Race

	1968		1970		1972		Increase	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Black	214,289	7.0	351.033	6.6	494.660	8.0	280.371	131
Spanish-surnamed	50,439	1.6	104.133	1.9	139.316	2.3	88.877	176
Oriental	22,847	0.7	58.397	1.1	68.355	1.1	45.508	199
American Indian	14,689	0.5	26.707	0.5	34,325	0.6	19,636	134
Total minority	302,264		540,270		736.656		434,392	
Average minority		9.8		10.1		12.0		144
Total non-minority	2,784.233		4.802,157		5,392.090		2,607,857	
Average non-minority		90.2		89.9		88.0		94
Total	3.086.497		5,342,427		6.128.746		3.042,249	
Average		100.0		100.0		100.0		99

While minority enrollment has been growing at a much higher rate than that of nonminorities, minority students comprised only 12 percent of all enrollments as of fall 1972. Except for Orientals, minority students were not as well represented at graduate and professional levels as they were at the undergraduate level. As of fall 1972, minorities comprised 12.4 percent of the undergraduate students and 8.7 percent of the graduate and professional students. Orientals comprised 1 percent of the undergraduates and 1.8 percent of the graduate and professional students.

Minority students were heavily concentrated in relatively few fields of study. For example, as of fall 1972, the Office for Civil Rights publication showed that 83 percent of all minority students were in the liberal arts/arts and sciences field. While nonminority students were also concentrated in this field (75 percent of total nonminority), there were over 1.3 million nonminority students in other academic fields of study compared to about 125,000 minority students.

Enrollment by Field of Study as of Fall 1972

	American Indian	Percentage	Black	Percentage	Oriental	Percentage	Spanish-surnamed	Percentage	Total minority	Percentage	Non-minority	Percentage	Total
Liberal arts/ arts and sciences	27.701	0.6	408.768	8.8	54.430	1.2	118.568	2.5	609,467	13.1	4.030.073	86.9	4.639.540
Physical sciences/ engineering/ applied technology	1,432	0.6	9.523	4.0	3.674	1.5	4,250	1.8	18,879	7.9	220,667	92.1	239,546
Agriculture	432	0.6	2,360	3.0	659	0.9	575	0.7	4,026	5.2	73.557	94.8	77.583
Business	1.223	0.4	18,523	6.2	2,245	0.8	4,262	1.4	26,253	8.8	271.639	91.2	297,892
Professional:													
Law	208	0.3	3.445	4.5	554	0.7	1,055	1.4	5.262	6.9	71,006	93.1	76,268
Medicine	79	0.2	2,619	4.9	802	1.5	609	1.1	4,109	7.7	49.218	92.3	53,327
Veterinary medicine	61	0.9	373	5.6	26	0.4	26	0.4	486	7.3	6,171	92.7	6.657
Dentistry	30	0.1	771	3.8	422	2.1	210	1.0	1,433	7.0	18.930	93.0	20,363
Theology	14	0.1	795	3.4	151	0.7	164	0.7	1,124	4.9	21,705	95.1	22,829
Other professional and semi-professional:	77	0.2	1.314	4.0	1,040	3.1	402	1.2	2,833	8.5	30,431	91.5	33,264
Fine arts/ architecture	491	0.4	5,251	4.4	1.381	1.2	1.629	1.4	8.752	7.4	109,570	92.6	118,322
Nursing and health services/ sciences	261	0.4	4.060	6.0	651	1.0	706	1.0	5,678	8.4	62,331	91.6	68.009
Social sciences & behavior	265	0.3	5,105	6.1	469	0.6	1,107	1.3	6,946	8.3	76,805	91.7	83,751
Education	1,566	0.4	30,779	8.7	1,390	0.4	5,221	1.5	38,956	11.0	315,035	89.0	353,991
Total	33,840		493,686		67,894		138.784		734,204		5,357,138		6,091,342
Percent of total		0.6		8.1		1.1		12.1		87.9		100.0	

The Institute for the Study of Educational Policy, Howard University, published in 1975, "Summary of Equal Educational Opportunity for Blacks in U.S. Higher Education: An Assessment," dealing with the 1973 to 1974 academic year. We believe the following excerpts from this report are pertinent to examining the supply of educated Blacks.

--Blacks have made considerable gains in U.S. higher education in the last decade, but the achievement has been irregular and inadequate.

--Blacks in higher education were increasingly concentrated in the lower cost, less selective institutions, without major graduate or research programs. Forty percent of all Blacks in college in fall 1973 were in 2-year institutions.

--In spring 1974, an estimated 5 percent of the bachelor degrees went to Blacks.

--The number of Blacks earning doctorate degrees in education reflected a shift in fields of study; Blacks moved away from the sciences and into education as they went from undergraduate to graduate schools, especially in predominantly white institutions. A factor possibly contributing to this shift was the perceived greater employment opportunities for Blacks in education.

--Black students were likely to be reluctant and sometimes discouraged from entering fields of study in which there were few Blacks, such as scientific and technical fields.

--Completing 4 or more years of college education produced considerable gains in average Black income and lifetime earnings.

--With the exception of doctoral degrees awarded, there is no regular national survey on any degrees earned by minorities in the United States.

--Because of conflicts and inconsistencies in racial statistics, the data in this report was to be treated as estimates.

A Bureau of Labor Statistics special labor force report contained information about workers of Spanish origin in a report on the educational attainment of workers in the civilian labor force as of March 1974. This was the first time labor force data on the education of Spanish-surnamed workers 16 years and older became available from the Bureau of Labor Statistics' annual survey. The following facts were included in the report.

--Four percent of the labor force, 3.8 million workers, were of Spanish origin. The median educational attainment of labor force members of Spanish origin was lower than that of all persons combined. A much higher proportion of Spanish origin workers had completed no more than elementary school--35 percent compared with 13 percent of all workers. While about 13.4 million persons (15 percent of the total work force) had 4 or more years of college, only about 221,000 persons (.25 percent of the total work force) of Spanish origin had this level of education.

--The lower educational attainment level and language problems of employed persons of Spanish origin were of paramount importance in determining their occupational distribution. Persons of Spanish origin were more likely to be in semiskilled and unskilled blue collar and service jobs than all workers and less likely to be in white collar or skilled jobs. However for men with 4 years of more of college, there was no difference in the occupational distribution of men of Spanish origin and all men--90 percent of both groups worked in white collar jobs, half as professional and kindred workers. Women of Spanish origin, however, regardless of educational attainment, were employed in blue collar occupations to a greater extent than all women. However, differences in occupational distribution were less pronounced among women who had received a high school diploma--nearly half of both groups were in clerical work and one-fifth of each were in service work.

Constraints in the hiring system

The preference accorded veterans in CSC examination ratings, register placement, and certification has had an adverse impact on Federal hiring of women.

Under provisions of the Veterans' Preference Act of 1944 (58 Stat. 387, as amended), Veterans' preference eligibles who receive a passing grade in an examination for entrance into the competitive service are entitled to additional points above their earned ratings. Ten points are added to the ratings of disabled veterans, and, in some cases, the mothers and spouses of deceased or disabled veterans also receive ten points. Five points are added to the ratings of all other preference eligibles. Ten-point veterans with any passing rating are also placed at the top of many registers. All preference eligibles are placed ahead of other applicants with the same ratings.

In addition, hiring for the positions of custodian, elevator operator, guard, and messenger is restricted to preference eligibles.

Since, according to a Civil Rights Commission report, about 99 percent of all United States veterans are males, it is apparent that this act restricts efforts to hire women. However, the Congress apparently considered that the impact of veterans preference on equal employment opportunities for women was an acceptable modification of the basic equal opportunity objective. In enacting the Equal Employment Opportunity Act of 1972, the Congress left intact a provision of the Civil Rights Act of 1964 (42 U.S.C. 2000e-11) which provides that the act should not be construed to repeal laws creating special preferences for veterans.

At the Federal agencies we visited, officials frequently mentioned that veterans' preference was detrimental to efforts to hire women. We are completing a detailed review of the effects of veterans' preference on the Federal job opportunities of women and minorities to be presented to the Congress later this year.

Another constraint in the Federal hiring system is the provision of law normally limiting to three the number of eligible persons considered for a specific job opening. This "rule of three" could result in many other equally qualified applicants not being provided with a reasonable opportunity to be considered for employment. This constraint applies to all applicants and is not exclusively applicable to women and minorities.

Virtually all Federal hires for the competitive service are made from the eligibles on CSC registers--a list of qualified applicants compiled in order of relative scores on examinations. According to law a Federal agency must (with certain exceptions) select new employees from the first three names listed on the certificate (a process commonly referred to as the "rule of three").

Our July 1974 report, "Improvements Needed in Examining and Selecting Applicants for Federal Employment," (B-179810) concluded:

--Under the rule of three, many applicants who may have qualifications equal to others could be denied the opportunity to be considered for employment.

--The rule of three should be broadened and Federal agencies should, within practical limits, be permitted to consider and fill vacancies from among all applicants in the best qualified level or group.

--Several alternative methods of accomplishing changes, such as category ranking, the rule of reliability, and the rule of ranks, would be fairer to the applicants, provide agencies with greater opportunity to obtain well-qualified applicants, and still provide necessary merit system safeguards.

CONCLUSIONS

After the Equal Employment Opportunity Act, women and minorities have

--increased their representation in the Federal work force and

--increased their proportions in mid-level and upper level jobs.

These gains have been made despite reported employment freezes, reductions in force, and low turnover due to the economic downturn.

However, although gains have been made, they have been modest gains, and women and minorities are still disproportionately represented in lower graded and lower paying jobs. The major cause is that, by and large, women and minorities in the Federal work force are concentrated in relatively few occupations; these occupations have the smaller proportions of professional and managerial positions and among the lowest average salaries. The major sources of applicants for professional Federal jobs--the civilian labor force and graduates of institutions of higher education--similarly have large concentrations of women and minorities in non-professional occupations or fields of study. The problems of lower grade levels and commensurately lower pay will persist until

--workable methods are found to encourge greater numbers of women and minorities to enter a broader array of professional and managerial fields,

--the demand for new employees is increased, and

--the constraints of the Federal hiring process are relaxed.

CHAPTER 4

ORGANIZATION AND RESOURCES

The head of each Federal executive agency is responsible for maintaining an affirmative program of EEO within the agency and assuring that adequate resources are provided to carry out the program. Because Federal agencies have not been required to maintain records of actual costs of their EEO programs and because of existing fundamental questions concerning what constitutes a successful, effective EEO program (as discussed in ch. 2 and 9), we were unable to evaluate fully the adequacy of staffing and funding. Throughout the Government agencies, we noted wide differences in the commitment of funds, the level of staffing, and the organizational structure, placement, and role of the EEO function.

INCREASING COMMITMENT OF RESOURCES TO EEO PROGRAM

Since enactment of the Equal Employment Opportunity Act of 1972, Federal agencies have greatly expanded their commitment of resources for EEO activities. CSC's data on EEO showed that estimated Government-wide EEO allocations more than doubled between fiscal year 1972 and 1974 and tripled by 1976 to about $169 million. Similarly, CSC reported that estimated Government-wide time devoted to EEO increased nearly 400 percent between 1972 and 1976 to over 10,200 staff years.

The reported increases for each agency in our review are shown in the following table.

	Staff-years			Outlays		
	1974	1976	Percentage increase	1974	1976	Percentage increase
				(thousands)		
Dept. of Agriculture	352	517	47	$ 7,545	$10.565	40
Dept. of the Air Force	459	1.091	138	6,091	14,518	138
Civil Service Commission	312	417	34	6,993	8,855	27
General Services Administration	157	251	60	2,099	3,515	67
Dept. of Health, Education and Welfare	498	565	13	12.621	14,882	18
Dept. of the Interior	185	277	50	3.408	5,419	59
Dept. of the Treasury	174	449	158	2,081	6,015	189
United States Postal Service	548	1,034	89	5,647	8,794	56
Veterans Administration	329	387	18	5,462	6,523	19
Total	3,014	4,988	65	$51,947	$79,086	52

While these nine agencies account for nearly half of the Federal resources reportedly devoted to EEO, they are not necessarily typical or representative of other agencies. Any interagency comparisons must consider the extent to which agencies have already developed their EEO programs, as well as the impact that the size and geographic/organizational dispersion of the work force has on EEO requirements.

ACTUAL COSTS OF EEO PROGRAM ARE NOT BEING MAINTAINED

The EEO program costs that Federal agencies reported to CSC were based on estimates rather than on actual experiences. Moreover, CSC officials informed us, at the time of our review, that CSC had no system for accumulating actual EEO costs; it relied solely on agency-provided estimates. Also, CSC did not verify the reasonableness of agency estimates.

Information on EEO dollar and staff allocations are compiled at the regional or field installation level to meet EEO affirmative action plan reporting requirements. The information developed is essentially an educated estimate by agency personnel.

Agencies did not include all the same cost categories or elements when reporting EEO resource allocations. At the time of our review, agencies were to report EEO resources in five basic categories: (1) EEO counseling, (2) complaint processing, (3) EEO program administration, (4) EEO subject-matter training, and (5) upward mobility training and education. A comparison of the most recent EEO resource data available at the 27 field offices we reviewed showed that 15 offices used all five EEO categories, 8 used four categories, 3 used two or fewer categories, and 1 activity did not have the information available.

In compiling or estimating EEO resources information, agency field offices also did not always include all costs attributable to the EEO program. Items often omitted included personnel costs of employees assigned EEO duties on a part-time basis, costs of recruitment by personnel office or operating division personnel, and indirect costs. We did not discern a consistent pattern from our visits to the 10 headquarters and 27 field activities on how information on EEO program resources was developed, except that there were no formalized records.

Although the Government-wide budget projections of EEO costs for the future tended to be understated compared to later reported cost estimates, the absence of adequate or consistent recordkeeping precluded any precise evaluations of the accuracy of EEO cost estimates. However, it seems likely that the reported costs of the EEO program are greatly understated because many agencies report only a few of the required cost categories and because costs of personnel assigned to part-time EEO duties, costs of EEO recruitment efforts, and indirect costs are often not included.

On April 30, 1976, CSC Federal Personnel Manual letter 713-35 superseded FPM letter 713-22. The new letter also prescribes specific details on preparing EEO plans but changes the pro forma schedule for allocating personnel and resources for EEO. The new schedule now provides for allocations in two broad program areas--EEO program administration and management and EEO personnel management training. Program administration will include EEO director and officers, Federal women's program and Spanish-speaking program coordinators, upward mobility program coordinators, and EEO specialists, counselors, and investigators.

MANAGEMENT APPROACH TO EEO PROGRAM

Federal departments and agencies have approached their EEO program management responsibilities in various ways. The unit designated to carry out the EEO program differs among agencies as to staffing, organizational location, accessibility to top management, assigning program responsibilities, and relationship with the agency's personnel function. The organizational pattern established at the headquarters level is commonly followed by the field activities.

Staffing of EEO program activities

Although the types of positions for EEO program activities are generally common to all headquarters and field activities, considerable differences exist in the per capita number of staff assigned and whether they are assigned on a full-time or part-time basis. EEO positions most commonly found include a designated EEO director, officer, or coordinator; a Federal women's program coordinator; a Spanish-speaking (16-point) program coordinator; EEO counselors; EEO investigators; other EEO specialists, and clerical personnel.

Each agency head is responsible for its EEO program and for providing adequate staffing and resources. To implement the program, each agency has been instructed to designate a director of EEO, who is supervised by the agency head; the director is to be given the authority necessary to carry out program responsibilities. Each agency is to appoint as many EEO officers as necessary to assist the agency head in carrying out these responsibilities. The chief EEO official at the headquarters we reviewed was generally a high level management official and, at 11 of the 27 field activities in our review, was the ranking agency official.

The individual responsible for handling day-to-day EEO program matters may be the designated chief EEO official or may be a subordinate official. In most cases this subordinate is an EEO specialist; however, some agencies assign these duties to the personnel officer or another management official. At one of the Veterans Administration activities we visited, program administration was handled by an EEO committee.

At field installations, as well as at the headquarters we reviewed, the individual responsible for the day-to-day EEO operations was frequently assigned to EEO duties on a full-time basis; most of the other EEO positions at those field activities were filled on a part-time basis. Assigning full-time employees to EEO duties was more common at headquarters levels.

The number of employees assigned to EEO duties part time at the activities we reviewed was nearly 8 times as great as the number assigned full time but varied widely among agencies and field activities. The largest number of part-time EEO employees were assigned as counselors, specialists, or clerical staff. Most field activities had established EEO committees. Although some of the committees were inactive and some had little impact on EEO operations and policy, others were involved in the program's execution and made considerable contributions. Also, some agencies had created subcommittees to address specific aspects of the EEO program.

Organizational placement of EEO function

The EEO program's location within an agency can determine whether EEO staff is involved with top management and with other management persons, especially in personnel. Except occasionally in personnel management evaluation reports on specific agencies, however, CSC has not taken a position or furnished specific guidance on where the EEO staff should be placed; this leaves the decision to the agency's discretion. Accordingly, the program's location in the various Federal agencies differs, as well as the EEO staff's interaction with personnel management.

The agencies in our review organized their EEO offices in the following ways.

- --As a separate, autonomous component responsible directly to a top management official.
- --As a separate component within a management or administrative division.
- --As a self-contained group or component within the personnel office, directly responsible to the personnel officer.

Although in most agencies and field activities the staff assigned to EEO duties did not report directly to top management, a few agencies made special provisions for key EEO officials to by-pass superiors on important EEO program and policy matters. Also, some field activities separated the complaint processing system from the organizational restraints and lines of authority that faced other EEO functions. Some agency officials suggested to us that a field EEO function should be completely independent of local management lines of authority and report directly to higher organizational levels.

The organizational structure and responsibilities of the EEO staff were not always clearly defined. The Internal Revenue Service said that responsibility for its various EEO programs was split between the EEO office and the personnel office; there was no single clearly defined source of EEO program direction, responsibility, and accountability. Field installations of the Social Security Administration were required to follow a very formal organizational structure through regional, bureau, agency headquarters, and departmental levels in acting and reporting on EEO matters. As a result, EEO officials at these field activities were faced with a confusing network of overlapping lines of authority when coping with EEO program matters.

At 7 of the 10 agencies we reviewed, the general placement of the EEO component and its relationship to the personnel office was the same at both agency headquarters and its field installations--as a part of the personnel office at two agencies and as a separate component at five other agencies. At the three remaining agencies, there was a mixed pattern with some activities combining the EEO and personnel functions and other activities separating them.

Role of EEO office and relationship with personnel office

The issue of whether the EEO function should be a part of the personnel office or an autonomous unit evoked considerable comment from agency officials at all levels. Most of the EEO staff officials wanted to be separate from personnel, which was a view not always shared by management and personnel officials.

The arguments for combining the EEO staff with personnel includes the following beliefs:

--The EEO program involves essentially personnel-related matters, such as hiring, promotion, training, and evaluation, and the personnel staff has the knowledge, expertise, and ability to keep up with personnel regulations and procedures.

--Integrating EEO and personnel minimizes problems that could occur if persons unfamiliar with personnel functions promise more than is feasible under existing requirements.

--There is less likelihood of conflicts arising between the EEO and personnel staffs if they are combined or closely related.

The arguments raised by agency officials favoring the separation of the EEO and personnel functions included the following:

--The EEO staff is more visible and credible if located outside of personnel.

--The EEO staff has better access to top management by not having to go through the personnel officer.

--Work priority conflicts, where regular personnel duties take precedence over EEO duties, are reduced.

--Many EEO problems are the result of personnel policies and practices, and the EEO program cannot be suppressed by the personnel office if it is separated from it.

Some activities have drawn upon the best of both approaches by separating the EEO staff from personnel but establishing a close working relationship between the two components. Such a relationship is, in our opinion, necessary to capitalize on the strengths of the two offices and to minimize the expenditure of agency resources. As stated earlier, most of the agencies we reviewed have increased both the size of their EEO staffs and their EEO expenses, some quite substantially. While increases in program resources generally occur during the early life of any new program, part of the increases in the EEO programs may have been caused because EEO staffs have increased their roles and responsibilities while usurping traditional responsibilities of the personnel office. This in turn could result in unnecessary duplication of effort between the two functions.

According to CSC, a long-range goal of EEO is to be integrated as part of the overall personnel management system within the Government. To better accomplish these objectives, we believe that EEO responsibilities should include three primary functions:

--Defining EEO policy and procedures for the organization.

--Improving the coordination with other organization components, especially with the personnel office.

--Establishing a monitoring system to evaluate periodically the operational aspects of EEO.

We believe that EEO staffs should make greater use of the expertise and resources of the personnel office but that personnel officials should have overall responsibility for recruitment, EEO training, and personnel evaluations of the EEO program; the EEO office should actively participate in these responsibilities. If EEO and personnel officials do not adequately communicate and coordinate, it will be more difficult to make EEO a part of the organizational mainstream.

There are various benefits to the above approach. Some of these benefits are:

--The use of personnel expertise in such areas as recruiting, EEO training, and internal evaluations will reduce duplication of effort by EEO and personnel.

--EEO staffs will be able to become more effective in identifying and defining EEO problems within their organization, devising the necessary policies and procedures to meet these problems, and monitoring the progress in solving the problems.

--Improved coordination and communication between EEO and the personnel office is essential for achieving the long-term goals of EEO. EEO officials should be aware of the personnel system just as personnel officials should be aware of EEO problems. There must be a common understanding of both the problems and constraints before realistic solutions can be devised and carried out.

CONCLUSIONS

While Federal agencies are investing considerable resources in EEO programs, there is little accurate, reliable information on what the programs are costing the Government or individual agencies. We believe that cost information for a Government-wide program as important and extensive as EEO should be based on more than mere estimates. The absence of complete and accurate recordkeeping on EEO program costs precludes a meaningful evaluation of the cost-effectivenss of EEO program efforts. Such information would be useful to agency managers, CSC, and the Congress for determining the appropriate level of effort for EEO matters. We therefore believe that CSC should require agencies to maintain financial information on their EEO programs. CSC should sufficiently guide agencies to assure completeness and uniformity in resources reported.

Federal agencies have been left on their own in organizing and staffing their EEO programs, without direct involvement or guidance by CSC. Based on our discussions with agency officials, including EEO personnel, there appear to be advantages and disadvantages for each of the various EEO organizational structures and locations within the agencies. We did not attempt to determine which arrangement was the best, or which provided the most advantages. We believe that each agency should analyze its own situation and problems and determine which organizational approach is most advantageous. In our view, the key to a successful EEO program is management commitment. As long as management supports the program, most organizational structures should be successful.

However, while agencies should be able to analyze their own needs, the lack of guidance from CSC may contribute to the differing EEO organizational structures, lack of coordination, and duplication of effort. Moreover, the continuing and considerable growth in resources being devoted to EEO programs Government-wide and at each organizational level demonstrates that guidance is needed for organizing EEO efforts effectively.

Because CSC has not structured or guided the EEO program, agency managers have had to structure and organize their EEO program without any clearly defined guidance. This undoubtedly has contributed to the varied and sometimes confusing approaches taken by Federal managers to meet their EEO requirements.

If CSC wants to avoid directly structuring agencies' EEO programs it could assist agency managers by developing information on the benefits and disadvantages of the different approaches to EEO program organization. CSC could compare the experiences of Federal agencies which have combined the EEO functions within personnel to those which have separated them. Also, the experiences of agencies which have separated EEO complaint processing from other EEO program efforts could be useful to agency managers.

CSC could also provide guidance on organizational arrangements considering such factors as the (1) size of the agency, (2) nature of its work and personnel, (3) overall organizational structure, (4) geographic dispersion of its offices, and (5) state of its EEO program development efforts.

CSC also should advise agencies that (1) EEO offices should use the expertise of personnel offices for recruitment, training, and internal evaluations, rather than unnecessarily duplicating those functions in their own units and (2) EEO offices and personnel should coordinate their efforts. We noted that many employees assigned EEO duties were strong EEO advocates, a desirable characteristic when dealing with other employees or the outside community. This could create adversary relationships between EEO staff and other employees; care should be taken to avoid this. It appears essential that the EEO staff receives guidance and support from top management and the personnel office if the EEO program is to be properly administered and to have the organization's full support.

Accordingly, we proposed that the Chairman of CSC (1) establish regulations requiring elements or components of EEO costs to be accounted for and (2) assure that all costs reasonably attributable to the EEO program are comprehensively and uniformly included. We also proposed that the Chairman conduct a study of agency EEO organizational patterns and practices and advise agencies of (1) criteria for organizational arrangements, including advantages and disadvantages of various arrangements and conditions to provide maximum program effectiveness and (2) the need for minimizing duplication of effort and maximizing cooperation and coordination between the EEO office and other agency components, particularly the personnel office.

AGENCY COMMENTS

CSC agreed that there was now an experiential base for a study of organizational patterns for the administration of EEO programs. (See app. I). In several reviews of the approaches taken by agencies, CSC stated that it had identified some organizational relationships which were less effective than others in furthering EEO. CSC also agreed that a comprehensive study was now in order and said that it expected to begin planning the study in the second quarter of fiscal year 1977.

CSC also stated that it believes cost report charts contained in Attachment 1 to FPM letter 713-35 will provide adequate cost data on each of the major EEO program components. Based on review by and comments from agency officials, CSC believes that these program components are discrete and measurable and that reportable cost units can yield more uniform Government-wide totals in each major program elements. CSC further stated that, based on its experience with fiscal year 1977 cost reports, it will issue any additional instructions to agencies that may be needed for improving reporting practices in later years.

We believe the above actions should improve EEO program management for Federal employees and job applicants. Obviously, however, CSC's successfully implementing these actions will require the full cooperation of the Federal executive departments and agencies.

The Department of the Interior, in commenting on the draft of this report (see app. VII), states that each agency must be permitted to organize and staff its EEO program in the most effective and efficient manner as determined by the agency. While we generally agree with this position, we believe that the agencies should make use of forthcoming CSC guidance.

Interior also states that it is concerned with our view that personnel officials should have overall responsibility for recruitment, EEO training, and personnel evaluations of the EEO program. Interior based this concern on the rationale that personnel offices tend to be understaffed so it is unrealistic to suggest that "* * * Personnel Directors use their precious few resources for a recruiting program when quite often they need only perform a placement

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service." While Interior's personnel office may lack the resources to become directly involved in a recruitment program, in our opinion, it should maintain overall control and coordination even though resources of the EEO staff or the line organization are used in the actual recruitment. We have often observed in our reviews of EEO and personnel matters in Federal agencies that the recruiting function tended to operate apart from the rest of the personnel system.

Interior also believes that any program's evaluation must be conducted by the organization having authority and responsibility to make changes or implement program policies and procedures; therefore, while the actual evaluation may be conducted as a joint effort to eliminate duplication and increase communication between EEO and personnel, program evaluation responsibility must rest distinctively with the EEO office.

The Department of the Treasury voiced sentiments contrary to Interior's in its response to our draft report (see app. IX). Treasury agreed that there is a need for clear cut CSC guidelines, including organizational location of the EEO office. It also acknowledged that, in some instances, there is a duplication of effort and believes that better coordination is needed between EEO and personnel office staffs. Treasury feels that it is desirable that the EEO office be both organizationally and physically separate from the personnel office. It believes that personnel functions should be the responsibility of the personnel office; this frees the EEO office to better monitor those functions and to identify problem areas. Treasury also believes that the separation of the two offices would afford the EEO office

--greater visibility,

--increased credibility, and

--access to the agency head.

RECOMMENDATIONS TO THE CHAIRMAN, CSC

We recommend that CSC complete a comprehensive study in a timely manner of organizational patterns for administering EEO programs and, upon completion, CSC advise agencies of criteria for organizational arrangements including advantages and disadvantages of various arrangements and conditions to provide maximum program effectiveness. We also recommend that CSC, based on its experience with fiscal year 1977 cost reports, issue additional instructions to agencies that may be needed.

RECOMMENDATIONS TO HEADS OF DEPARTMENTS AND AGENCIES

We recommend that all Federal executive departments and agencies subject to the Equal Employment Opportunity Act of 1972's provisions (1) cooperate fully with CSC in its study of EEO organizational arrangements and (2) effectively use the study's results. The departments and agencies should also seek to improve both the EEO and personnel functions by eliminating any unnecesssary duplication of effort and by assuring effective cooperation and coordination. Further, we recommend that all departments and agencies fully cooperate with CSC's efforts to obtain comprehensive and accurate EEO program cost information.

CHAPTER 5

SETTING AFFIRMATIVE ACTION PLAN EMPLOYMENT GOALS

Most affirmative action plans we reviewed contained employment goals for women and minorities; however, there were considerable differences among agencies in the way goals were developed and in the adequacy of the data used to support the goals. Because of deficiencies in the goal development process and because information was not available to agencies on the race and sex makeup of CSC employment registers, the primary source of Federal hiring activity, there was little assurance that the employment goals established were reasonable, challenging, and realistic. Also, the employment goals that were established nearly always focused only on hiring goals; we found little evidence of agencies setting and using recruiting goals. CSC has advised agencies that affirmative action plans should include employment goals where representation of women and minorities in the agency's work force is less than what should reasonably be expected considering the availability of qualified members of these groups in the labor markets. CSC has stressed that such goals are to be based on the merit system of employment and must not be considered or used as quotas where managers would be required to employ a certain number or percentage of particular group members without regard to merit system requirements.

Our review of regional affirmative action plans prepared by 27 Federal agency field installations showed that most plans included EEO hiring goals, although there were considerable differences in the way hiring goals were developed and presented. Some goals were developed informally with little analysis of work force imbalances, whereas other goals were developed through detailed analyses. Hiring goals were presented in various ways, including projections of work force composition at the end of the plan year, estimated percentages of females and minorities among new employees, and specific numbers of estimated new hires by race and sex. Hiring goals also varied in the manner and the extent to which they were developed and presented by organizational units and occupational categories.

Agencies also used various methods and data for determining the extent of underrepresentation of women and minorities and the availability of members of those groups for employment by a particular agency. Some of the hiring goals also appeared to be presented as quotas rather than goals. Because of inadequate work force and labor resource analyses, the use of questionable or inappropriate data, and a lack of documentation, we found no assurance that agencies' employment goals were reasonable.

CSC GUIDANCE FOR DEVELOPING EEO EMPLOYMENT GOALS

FPM letter 713-22 of October 4, 1973, provided CSC guidance to agencies and stated that numerical goals can contribute to the resolution of EEO problems. Although CSC did not require that hiring goals be developed, it stated:

> "When used, goals should be set at the lowest practicable level in the agency to assure that they are reasonable in terms of their relationship to hiring needs and the skills available in the recruiting area. Furthermore, national plans should clearly indicate that the establishment of local goals must be consistent with merit principles and not be stated so as to imply preferential selection procedures."

The emphasis placed by CSC on setting local goals and at the lowest practicable organizational level in the agency is important since nearly 90 percent of the Federal work force is located outside the Washington, D.C., metropolitan area.

The letter stated that employment goals should be established where employment of minorities and women is less than what should be reasonably expected in view of the representation of qualified members of these groups in area labor forces and recruiting areas. The guidance also stated that factors to be considered in developing hiring goals included (1) occupations and grade levels of agency females and minorities, (2) composition of minorities and women by skills in the recruiting areas, (3) representation of women and minorities in the agency's various organizational levels and components, and (4) estimated turnover and hiring, by occupation.

The most common data source used by agencies for assessing labor resources was the 1970 U.S. census; however, that data was not fully reliable because of its age and other limitations. In providing its regions with occupational data from the 1970 census, CSC Headquarters cautions that agencies should be advised that the data is outdated and lacks information on American Indians and Orientals and on persons skilled but not employed in various occupations. CSC advised that the data should therefore be considered as providing only a minimum assessment of availability.

Other reliable and authoritative data on the race and sex of persons graduating from schools or otherwise available in the various professional and nonprofessional fields was also limited. Nevertheless, we believe that CSC needs to provide such data to agencies on a national and regional basis because (1) analysis of the data could aid agencies in setting more realistic goals and developing effective recruiting plans and (2) centralized collection and distribution of the data could avoid wasteful duplication of individual agencies' efforts to obtain additional data. Analyzing this type of data could also be useful in helping formulate Government-wide policies for attracting minorities and females into occupations where they are underrepresented.

CSC modified its guidance to agencies on preparing affirmative action plans and developing goals by issuing FPM letter no. 713-35 effective April 30, 1976. The modified guidelines provide for expansion of the required agency analysis of its work force and the availability of skilled and trained persons in the appropriate labor markets to establish more realistic goals. Equally important, the guidelines indicate that CSC will provide statistical data and other information needed by agencies to (1) compare their work force with nationwide or local Federal civilian work forces and (2) determine the availability of skilled and trained persons, including minorities and women, in the labor market which the agency uses as its recruiting source. We believe that CSC's guidelines revisions could minimize or eliminate some of the major differences we found in the way that agencies develop and present affirmative action goals and help assure that goals are more realistic and challenging. (See pp. 58 and 59.) However, as discussed in chapter 2 of this report, a number of fundamental issues dealing with establishing employment goals and evaluating agencies' EEO performance have not been resolved.

AGENCY GUIDANCE ON DEVELOPING HIRING GOALS

For the 10 agencies we reviewed, guidance or instructions provided by higher agency levels to operating units at headquarters and field activities on developing numerical goals varied from little or no guidance to specifying goals. For example, the Forest Service developed national percentage goals, such as specifying that 25 percent of all new clerical employees were to be minorities, and required that all regional offices regardless of location include the same percentage goals in their plans. The General Services Administration's guidance to its field installations (1) included specific goal development and statement formats, (2) directed that operating units develop their own goals, (3) specified the occupational categories to be used, (4) included the area labor resource data by occupational category, and (5) provided the formula for determining under or overrepresentation. The Air Force provided more general instructions on the methodology to be used in developing numerical hiring goals and required that both 1- and 5-year goals be developed.

DEVELOPMENT OF HIRING GOALS

Although none of the 27 field installations we visited had established numerical recruiting goals, most had included numerical hiring goals in their current affirmative action plan. Complete data was generally not available documenting the development of specific hiring goals, but most goals, in part, compared the racial and sex composition of the installations' work forces with the composition of the local area population or labor markets. The most common source for labor resource data was the 1970 census, although in some cases resource data was obtained from other sources, such as State labor departments.

The lack of supporting documentation limited our analysis of agencies' goal development processes, but available data and oral explanations indicated a considerable diversity of methods used by agencies and installations to develop their hiring goals. These methods included

--relying almost entirely on judgment;

--using population statistics;

--using labor force statistics;

--developing goals for each or selected organizational units;

--developing goals for the installation as a whole;

--analyzing and developing race and sex goals by occupational categories;

--developing goals based on grade levels or the installation as a whole;

--developing goals by operating units;

--developing goals by a field staff office, such as personnel or EEO;

--setting goals for individual minority groups; or

--setting goals for all minorities as one group.

The following examples illustrate the various procedures and approaches used to develop hiring or employment goals.

Example 1

An Air Force installation set a goal to increase minority representation 0.2 percent a year for 5 years to bring the percentage of minorities in the installation's work force into balance with the minority percentage in the local area population. There were also fiscal year 1975 goals to fill 15 and 6 percent of professional, administrative, and technical vacancies with women and minorities, respectively, but there were no records showing how those percentages were developed.

Example 2

The only hiring goals listed in a Forest Service regional action plan were percentage goals prescribed by agency headquarters for women and minorities regardless of their location. Organizational units responsible to the regional office developed goals based on local conditions, but these goals were not included in the regional action plan.

Example 3

A General Services Administration regional office developed hiring goals by race and sex within occupational categories for each organizational unit. The process included comparing each unit's work force composition with the race and sex makeup of the local labor force for the particular occupational categories. Although agency instructions indicated that goals were to be developed based on the merit system and should be attainable, at least one of the regional organizational units did not follow that process. Instead, it set its hiring goals at the numbers needed to achieve parity based on race and sex, rather than considering the availability of qualified candidates by race and sex.

Example 4

An Internal Revenue Service activity set year-end work force goals rather than hiring goals. The employment goals were intended to show the projected race and sex composition, by grade level, of each organizational unit at the end of the plan year. There was no data showing how the installation assessed the reasonableness of its work force composition or how the goals were developed. Our discussions with operating officials indicated that they developed the goals subjectively.

Example 5

A Social Security Administration activity prepared hiring goals at the division level and then consolidated the goals at the installation level on the basis of what "felt right" to officials. We found a disparity among the divisions in the methodology used to develop the goals. In one case, the goals were indicated to have been "pulled from thin air," in another case to have involved "guesstimates," and in a third case, to have been produced through a very systematic process.

Example 6

Another Social Security Administration activity developed goals that virtually excluded males, particularly nonminority males, from hiring consideration. A CSC official informed us that the goals, if attained, would be exclusionary, discriminatory, and in violation of the 1972 act. CSC did not review or approve the action plan for this installation.

Example 7

The hiring goals for a Customs Service activity were vague; the goals typically concerned "eliminating zero census of minorities and/or women."

LACK OF A TRACKING SYSTEM

One of the greatest problems we noted with the development of employment goals was the lack of sex and race information in CSC employment registers--the primary source for Federal agencies' hiring activity. Even though virtually all new employees in the competitive system are obtained by Federal agencies through CSC registers, CSC does not have a system for identifying and tracking groups of persons by race and sex from the registers through selection or rejection by agencies. In an April 1975 report to the Senate Committee on Labor and Public Welfare ("National Aeronautics and Space Administration's Equal Employment Opportunity Program Could be Improved," FPCD-75-107, Apr. 16, 1975) we recommended that CSC devise such a tracking system. In a July 1975 letter to the Senate Committee, CSC stated that it was looking into the feasibility of developing this system. The need for a tracking system is discussed in chapter 9.

Such information would allow CSC to analyze the race and sex composition of its registers and determine what recruiting actions agencies need to take to alleviate underrepresentation of minorities and women. Goals for recruitment activities, if needed, could be established as a result of the analysis; such goals would be in addition to hiring goals.

CSC could also provide race and sex tracking data to agencies so that management could monitor the activities of selection officials and thereby assure that selection officials practice EEO. Any great variations between the race and sex composition of those considered by a selection official and those selected should initiate an investigation. CSC could also require the agencies to make periodic work force analyses to track employment trends.

Another benefit of a tracking system providing data on the race and sex composition of registers which would allow goal setting to be focused partly on recruitment needs would be to relieve potential adverse pressure from goals set only for selection. Although CSC has clearly informed agencies that hiring goals are not to be treated as quotas and that all employment is to be in accord with merit system requirements, it is possible that selecting or appointing officials will give some consideration to race and sex in their hiring decisions to help assure that they meet or exceed established goals. Goals set only for hiring may even stimulate such bias and preferential treatment. The Equal Employment Opportunity Act does not mention any specific race or sex and provides that there shall be EEO for all applicants.

CONCLUSIONS

We found little assurance that the EEO hiring goals set by the Federal agencies we reviewed were realistic. This was because of the

--considerable differences in the ways agencies develop affirmative action employment goals,

--questionable adequacy of population, labor force, and other data on skills availability used to support the goals, and

--limited amount of data documenting the development of specific goals.

These reasons are not applicable to each agency. The goal deficiencies result from (1) inadequate work force assessments, (2) inadequate labor resource assessments, (3) arbitrary establishment of goals, and (4) establishment of goals that appear to substantially exclude certain groups from employment consideration. Because goals were based on inadequate analysis or inappropriate data, their reasonableness is obviously questionable. The use of population rather than labor force data in making labor resource assessments does not seem generally appropriate nor does it comply with CSC guidance. The failure of some agencies to consider occupational data in work force and labor resource analyses is an important weakness in goal setting and is also contrary to CSC guidelines. Further, the general failure of agencies to establish or consider recruiting goals limits the usefulness of the goal setting process. CSC has recently revised its guidelines and is calling for marked improvement by agencies in assessing EEO conditions, identifying problems, developing realistic objectives, and developing goals using pertinent data and information. But our review indicated that the guidelines will not completely eliminate the goal development deficiencies we observed because of existing problems relating to the methodology, purposes, and objectives of goal setting.

Perhaps the most notable deficiency in goal development is the inability of agencies to consider the specific labor resources--primarily lists of applicants from CSC employment registers--from which agency selection officials hire most employees. We believe that CSC needs to obtain and to provide agencies with data on the composite groupings of persons by race and sex, as tracked through the employment process. Such information would enable agencies to structure their recruitment activities toward identified problems of underrepresentation and to monitor selection activities to assure that EEO is being provided. It would also allow CSC to expand the goal setting process to include establishing recruiting goals, as well as hiring goals.

Accordingly, we proposed that the Chairman, CSC:

- --Devise a system whereby CSC and other Federal agencies can track groups or persons by race and sex through CSC registers for selection or rejection by the agencies. Such a system should be concerned only with appropriate composite groupings of persons and should protect and preserve the individual's anonymity. (A recommendation to this effect was also made to CSC in our April 16, 1975, report to the Chairman, Senate Committee on Labor and Public Welfare (FPCD-75-107.))

- --Consider revamping the Federal EEO program by shifting emphasis of agency goal setting from hiring, or selection, to the recruitment process.

AGENCY COMMENTS

CSC stated (see app. I) that on November 23, 1976, it adopted the Federal Executive Agency Guidelines on Employee Selection Procedures; these guidelines require agencies to determine whether procedures used in selecting applicants for Federal employment result in disparate treatment of racial or minority groups.

> "Preliminary plans are being made for the development of a tracking system but several problems remain to be solved * *. Principal among them is now to gather accurate data without asking applicants for racial or minority identification. Requesting such information is now prohibited by Civil Service Rule 4.2. We [CSC] have begun to explore the possibilities of tracking samples of applicants and to gather cost estimates for both sample and total applicant populations. Since many variables are involved it would be difficult at this time to estimate when preliminary data would be available for analysis * * *."

Our proposal to shift the emphasis from hiring goals to recruiting goals evoked considerable comment from CSC and a number of agencies in our review. CSC said (see app. I) that it believed that it was not so much a matter of changing emphasis as taking proper account of the recruiting market and recruiting needs in developing hiring goals. CSC also stated:

> "It is important that agencies work closely with Commission area offices to ensure that no recruiting is undertaken for positions where there is already more than an adequate supply of candidates or where in fact registers are closed * * *. Many of our area offices are now working under the Managed Approach to Recruitment (MAR). Applications for positions are accepted on an as-needed basis, based on agencies' rejected new hire estimates. If there is a need for applicants, the area offices announce the positions, usually through their Job Information Centers. This would be the point where additional affirmative action outreach recruiting efforts could be effectively undertaken; Commission offices and the agencies might coordinate their recruiting efforts in these situations to provide a large supply of candidates which would hopefully be reflective of the available candidate population in terms of race, ethnic origin and sex."

We strongly agree with CSC; it is essential for agencies to take proper account of the recruiting market and recruiting needs. Agencies are not free to hire for the sake of hiring, and they should not recruit for the sake of recruiting. It must be done in a thoughtful, systematic, and purposeful manner.

However, we believe that recruiting goals should be considered until the problem of underrepresentation of minorities and women in many Federal occupations is resolved. Further, we believe that using recruiting goals would integrate the recruiting function more closely with the rest of the personnel management system. Several of the agencies commenting on our report endorsed adopting recruiting goals but not at the expense of abandoning hiring goals. For example, the Acting Assistant Secretary of Defense for Manpower and Reserve Affairs stated that our recommendation on goal setting

> "properly places emphasis on recruitment.* * * But the recommendation is diminished * * * by a shift away from hiring goals.* * * Hence we believe complementary efforts in hiring goals and in recruitment will result in a balanced program." * * * (See app. III.)

The Department of Interior stated that,

> "We concur with the proposed shift of emphasis of goal setting from hiring to the recruitment process; however, while an increased emphasis on recruitment is desirable, we feel strongly that this should not be considered a substitute for establishing and monitoring realistic goals in hiring." (See app. VII.)

The Department of the Treasury recommends that,

> "The CSC should create an expansion of emphasis to include recruitment goals as well as hiring or selection goals." (See app. IX.)

RECOMMENDATIONS TO THE CHAIRMAN, CSC

We recommend that CSC continue with its development of a tracking system and require agencies to use recruiting goals in addition to hiring goals. CSC should also provide appropriate criteria for developing such recruiting goals.

CHAPTER 6

SUBMISSION, REVIEW, AND APPROVAL OF AFFIRMATIVE ACTION PLANS

The 1972 Equal Employment Opportunity Act requires Federal agencies to submit national and regional affirmative action plans to CSC for review and approval. Our review of the approval process showed a need for (1) more timely submission of agency action plans, (2) more timely CSC review and approval of plans, and (3) improved CSC guidance to Federal agencies. As a result of untimely submissions, lengthy reviews, and frequent revisions, some plans were not approved until many months after the start of the plan year. In a few cases the plan year had expired or nearly expired by the time approval was received.

We also found that CSC, in determining which agency organizational levels should submit action plans for CSC review and approval, had not required submissions by (1) some organization levels with national program responsibilities and (2) some field installations with a structure and staffing comparable to installations required to make such submissions.

On April 30, 1976, CSC issued a revision of its guidelines to agencies for preparing and submitting affirmative action plans. These revised guidelines, when fully implemented, should, in our opinion, eliminate or minimize several of the problems we found. We believe, however, that CSC should consider revising its affirmative action plan review procedure by making a more detailed, indepth review of a sample of plans each year, rather than by trying to review all plans submitted.

AGENCIES' TIMELINESS IN SUBMITTING AFFIRMATIVE ACTION PLANS

Before April 30, 1976, CSC required agencies to submit their national plans at least 2 months before the start of their plan year and their regional plans no later than 1 month after the start of the plan year. Timely submissions are needed to help insure that agencies can carry out acceptable affirmative action programs for as much of the plan year as possible.

The national plans we reviewed were generally submitted on time, but most of the regional plans were not: 16 out of 18 were late in 1974; 12 out of 17 were late in 1975.

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TIMELINESS OF CSC REVIEWS

CSC officials generally said that, at the time of our review, their goal was to complete their first review action, that is, either approve the plan or inform the agency of revisions needed, within 60 days after the plan is received. CSC met this goal for only about half of the plans it received.

Officials at three of the six CSC regional offices we visited said one factor affecting timeliness was the limited resources they had for reviewing action plans. For example, EEO officials at CSC's San Francisco region said their resources were not adequate to review the action plans for over 700 Federal establishments in the region. An EEO official at the St. Louis region noted that he had requested a budget of $72,000 for fiscal year 1975, that only $60,000 was approved, and that that amount was later reduced to below $50,000. He said that as a result assistance visits to agencies were limited and that reviewing the plans took more time.

The most important factor adversely affecting timely approvals, however, was the high incidence of plans requiring revision. CSC's New York region advised us that about 85 percent of the plans it reviewed required revision because of deficiencies in the form or the substance of the plans. At the nearly 20 agency field locations where the data was available, records showed that 89 and 65 percent of the 1974 and 1975 regional plans, respectively, required revision. These percentages do not include those plans which were approved by CSC upon initial review but for which CSC still required or suggested changes.

Changes in procedures for reviewing action plans also can increase processing time if not properly planned and controlled. CSC's Chicago region decentralized its action plan reviews to its area offices, although the regional office retained final approval authority. Before decentralization, the action plans were being reviewed in less than 60 days, but afterwards some review times extended beyond 60 days.

NEED FOR IMPROVED CSC GUIDANCE

At the time of our review, CSC guidance to agencies for preparing affirmative action plans consisted primarily of the FPM letter 713-22, dated October 4, 1973, which included the "Guide for Organization and Content of Agency

Annual EEO Plans of Action." Other guidance was included in CSC letters and bulletins on specific EEO matters, such as upward mobility. Although officials at some of the agencies said they considered CSC guidance adequate, others said the guidance was not. Officials at three agencies (Forest Service, General Services Administration, and National Park Service) in one CSC region said they received little help from CSC in developing their action plans. Officials at three agencies (Air Force, Fish and Wildlife Service, Veterans Administration) in another CSC region said CSC guidance was too general, both in what CSC expected action plans to contain and what was wrong with rejected action plans. In a third CSC region, officials at the majority of agencies we visited said that they did not receive any guidance or support from CSC. A Postal Service official in that region said CSC assistance in preparing the plan was requested but not provided.

Although some agency officials may have understated the amount of CSC guidance they received, particularly those who said they received none, the need for improved guidance seemed evident by the considerable number of action plans either never approved or requiring revision before or after approval. Some CSC regional officials said they had no definite criteria for evaluating agencies' goals and timetables and that they relied to some extent on their own judgment and experience. According to a study made in 1975 by CSC's Director, Office of Federal Equal Employment Opportunity, there were major differences among the criteria and the approaches used by the 10 CSC regional offices to evaluate agency EEO plans. Agencies might therefore expect to encounter some difficulties in developing action plans satisfying requirements that are to some extent subjective and inconsistent.

Some CSC regions seemed more strict than others in what they required an action plan to contain. An EEO official in CSC's Chicago region said that his region might require more specific goal statements and methods of measurements than other regions and that plans he rejected might be acceptable to other CSC regions. We reviewed the CSC files for the 1973, 1974, and 1975 action plans for six agencies in that region and found that CSC had approved only two of the 1973 plans, none of the 1974 plans, and three of the 1975 plans. In the San Francisco region, agency records showed that CSC had continued to request a revised action plan even after the plan year was nearly over.

CSC revisions to regulations

On April 30, 1976, CSC published FPM letter 713-35, which superseded FPM letter 713-22 and outlined changes in emphasis related to EEO plans submitted by agencies and installations for CSC approval.

The new regulation was issued because CSC believed the following areas required increased attention:

--Assessment of conditions which hinder full realization of EEO goals, identification of problems from this assessment, and development of realistic objectives to solve those problems.

--Development of plans structured around pertinent data and information which contribute to the attainment of EEO objectives.

--Timely submission of complete and adequate plans.

--Consistency in the application of policy by agencies and in review of plans by CSC.

FPM letter 713-35 provided changes in EEO plan development and submission procedures which should help agencies prepare more realistic plans and reduce the time required to prepare them.

For example, introductory materials, such as agency policy, interrelationships of program officials, and expected involvement of managers and supervisors, need be submitted only once and referenced in subsequent years with updates routinely submitted to CSC; agencies' annual action plans on the national and major command levels may cover, with CSC permission, up to a 4-year period, whereas regional plans may cover a 2-year period; and the report of objectives and action items will include only those for which assessment discloses specific problems (except that those actions involving timely processing of discrimination complaints and upward mobility still require annual submission).

The revised regulation also provided several pro-forma schedules for reporting such items as EEO complaint processing, counseling activity, and corrective actions taken.

Other changes include requiring modification of agency plans if goals and timetables are not included where circumstances clearly indicate they would be appropriate. Previously, agencies were only urged to establish goals and timetables in problem areas where progress was recognized as necessary.

CSC stated that, as more refined statistical data became available, it would be provided to agencies by CSC's Office of Federal Equal Employment Opportunity and that the following assessments should be made:

1. Compare agency or installation occupational data with appropriate Federal civilian work force data.

2. Determine availability of minorities and women having the requisite skills in the labor market which the agency uses as its recruiting source.

The agreement by CSC to provide occupational and work force data should aid the agencies in setting more realistic hiring goals and should avoid the duplication of each agency gathering this data.

NEED FOR IMPROVED PROCEDURES FOR DESIGNATING AGENCY LEVELS REQUIRED TO SUBMIT ACTION PLANS

Our review of 27 field organizations included 22 that were required to submit action plans to CSC for approval and 5 not required to make such submissions. Some of the organizations which were not required to submit action plans to CSC were about the same size and had about the same level of operating responsibility as did other organizations which were required to submit plans.

The 1972 Equal Employment Opportunity Act requires agencies to submit regional affirmative action plans to CSC annually for review and approval, but at the time of our review, CSC had not precisely defined organizational levels required to submit regional action plans. Instead, CSC had stated that some of the considerations should be (1) location of appointing authority, (2) staffing and EEO activity within a defined geographical area, and (3) size of the agency's work force needed to make review and approval meaningful. On the basis of these considerations and agreements with Federal agencies, CSC designated specific installations as required to submit regional action plans for CSC approval.

The new guidance, FPM letter 713-35, states that CSC's Director of the Office of Federal EEO and CSC Regional Directors may require that agencies submit plans which were not previously scheduled for CSC review and approval.

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Agency components with major nationwide responsibilities

The organizational structures of most Federal departments include separate bureau or agency components responsible for major nationwide programs. For example, the Internal Revenue Service and the Customs Service have nationwide responsibility for separate major programs or activities of the Treasury Department as do the Social Security Administration and the Office of Education in the Department of Health, Education, and Welfare and the National Park Service and the Bureau of Sport Fisheries and Wildlife in the Department of the Interior. Our review showed that, although most of these nationwide agencies prepared national affirmative action plans, they were not submitted to CSC for review and approval. Instead, these plans were used as input to the national plans of the parent department, with only the latter's action plan required to be submitted to CSC.

Each major Federal bureau or agency, even within the same department, must define a practical approach to EEO consistent with its own particular opportunities and operating constraints. Separate agencies of the same department may have different skills requirements, serve different publics, have different organizational structures, be located in different types of locales, and have different EEO problems and hiring constraints. Considering also that many of these component bureau or agency organizations are responsible for nationwide programs, direct the activities of numerous field installations, and may have as many as 75,000 or more employees, it seems appropriate that CSC should review and approve their national plans. In this way, CSC would be more aware of the EEO programs of these organizations and be better able to direct comments about needed improvements to the operationally responsible organization.

CSC SHOULD CONSIDER REVISING AFFIRMATIVE ACTION PLAN REVIEW PRACTICES

Agency affirmative action plans should be a vehicle used to address EEO problems and to provide an action-oriented approach to solving the defined problems. Action plans should be results oriented and not maintenance or instruction oriented. We found that many of the action items contained in the plans were not results oriented. Also many action items were repeated in more than one plan; yet, there was no explanation by the agency as to why the action items had not been achieved previously.

Almost all EEO officials we interviewed agreed that too much time was being spent in developing the plans and that not enough time was available for implementing and reviewing the EEO program. Officials suggested that the plans should be more action oriented and should be based on a multiyear cycle rather than on an annual cycle.

CSC has recognized certain of these weaknesses and, as indicated earlier, has issued FPM letter 713-35. The regulations now permit affirmative action plans (the objectives and action item section) that extend beyond 1 year and emphasize that plans should be more action and results oriented.

We believe that it will be of benefit to agencies to have a multiyear, results-oriented plan. An action-oriented plan will require agencies to submit a more meaningful, less bulky plan. Agencies should be able to identify their problems and develop approaches to solving their problems in a shorter time period and also in a shorter document. Also, with an action plan covering more than 1 year, agencies should be able to develop more effective and realistic plans and to spend more time implementing, reviewing, and monitoring the EEO program.

In addition to these recent changes, we believe that CSC should also consider revamping its action plan review process. We believe that it should be the agency's responsibility to review and certify affirmative action plans for the organization. Without a thorough review of subordinate activity plans, it would seem difficult for top-agency officials to make meaningful and adequate EEO policy.

As previously indicated, subordinate activities of agencies outside the Washington, D.C., metropolitan area employ nearly 90 percent of all Federal civilian employees. Therefore agencies should establish a review procedure to accomplish this objective. Any additional burden placed on agency staffs in reviewing subordinate installation plans should be offset by modifications already being implemented by CSC (multiyear plans and action-oriented approach).

CSC should then redefine the scope of its own review of agency plans. A review procedure should be devised which would allow CSC to sample agency plans for review. The sample approach could provide the following benefits.

1. It would allow CSC to improve the quality of its coverage. Currently, CSC reviews about 1,200 out of 4,000 agency plans. CSC could, on the basis of information available, determine for itself which plans it wanted to review. Under current procedures, many plans have never been reviewed although others may be reviewed yearly where no problems exist.

2. It would allow CSC to spread its review work more evenly throughout the year. Beginning October 1, 1976, all plans were to be prepared on a fiscal-year basis. This could cause peaks in the system; a revision could provide for a more even flow of the workload.

3. A more thorough review by CSC officials would be possible. If the workload were spread more evenly, there would be no need for CSC to rush through the review of a plan because of arbitrarily imposed deadlines. It could also minimize the learning-curve problems which arise when CSC personnel from areas outside of EEO, who may know little of agency EEO problems, are assigned to review plans.

CONCLUSIONS

The most important factor affecting the submission and approval of affirmative action plans appeared to be that most plans as initially submitted were not acceptable to CSC. The large number of plans requiring revision not only affected the timeliness of agency submission of plans and the timeliness of CSC review and approvals but also indicated a need for improved CSC guidance and communications to agencies regarding specific affirmative action plan requirements.

CSC has now developed revised guidelines and timetables for agencies submitting affirmative action plans; these guidelines, if adequately implemented, could eliminate or minimize several of the problems we observed.

CSC's designation of agency organizations required to submit action plans to CSC for review and approval formerly excluded from that requirement major agency components responsible for nationwide programs. New CSC guidance now provides that such components may be required to submit their plans, which should help to better insure that their EEO programs meet CSC guidelines. The new regulations, however, did not address the problem of CSC's inconsistency in determining the size or level of responsibility of agency installations required to submit regional action plans. Some field organizations do not have to submit action plans to CSC even though they have staff and responsibilities comparable to installations subject to such requirements.

CSC needs to revamp its affirmative action plan review and approval practices by delegating more responsibility for review of agency regional and headquarters activities plans to the agencies and using CSC's resources for more indepth reviews than is currently practicable. CSC should also select plans for review on a sample basis to broaden the scope of plans which can be reviewed and to provide the time needed to maximize the thoroughness and benefits of the reviews.

Accordingly, we proposed that the Chairman, CSC:

--Reexamine CSC's designations of agency components and installations required to submit affirmative action plans to CSC for review and approval and take action to require major agency components with national responsibilities to submit their action plans to CSC. Also CSC should provide more uniformity in size and responsibility criteria for determining agency installations to submit regional action plans.

--Consider increased delegation of plan reviews to agency headquarters and selection of agency plans for CSC review on a sample basis.

AGENCY COMMENTS

CSC stated that it had done what we proposed. (See app. I.) It said that a CSC June 7, 1976, memo to EEO Directors and Personnel Directors and a CSC bulletin to be published (not issued as of May 9, 1977) prescribe:

> "* * * criteria to ensure that plans are submitted on national, major subordinate command, and installation levels in a uniform manner. Included are elements of a modified plan prepared by agencies having fewer than 100 employees and a list of the major subordinate organizations required for the first time to submit plans. We believe that these guidelines will strengthen our ability to act in a more unified manner and provide flexibility when needed in local situations. Additionally, these new criteria will enable us to plan more precisely for workload demand, to schedule EEO staff involvement in evaluation of agency programs, and to focus

technical assistance and followup efforts on those installations where the need is greatest. Further, we estimate that these new guidelines will reduce the number of regional/installation plans submitted to CSC offices by as much as 50 percent. In many cases this will increase plan review activity at agency headquarters and major subordinate organizational levels.

The Department of Health, Education, and Welfare said that it strongly supported the multiyear plan concept. (See app. V.) According to the Department:

--It is inclined to recommend a 3-year cycle for regional and national plans in that the process is equally demanding and time consuming for both.

--It believes the law requiring annual plans needs to be changed so that the energies and resources of EEO officials and managers can be reassigned to implementation and monitoring.

--Submitting plans once very 3 years with staggered submission dates of different years for different departments or agencies would greatly cut down on the Affirmative Action Plan review work of CSC and permit a more indepth and timely review.

--It agrees that much more discussion is needed regarding the criteria for which organizational units at what levels need to prepare individual plans and which ones need to be submitted to CSC for review and approval.

--It believes that size is overrated as a factor for consideration. Equally and often more important are such things as location of implementation authority, geographic location, and/or the variety of missions of the different units necessitating different approaches.

The Department of the Treasury agreed with our proposals and said it believed considerable improvement of the entire action plan process was urgently needed. (See app. IX.)

We believe the actions taken and planned by CSC should improve the EEO plan process, but further refinements undoubtedly can be made, such as making the process more streamlined, consistent, and action oriented.

RECOMMENDATIONS TO THE CHAIRMAN, CSC

We recommend that CSC complete and issue its new affirmative action plan guidance in a timely manner. The plan process should continue to be monitored and evaluated to identify areas in which the process can be further improved.

RECOMMENDATIONS TO DEPARTMENT AND AGENCY HEADS

We recommend that all departments and agencies carefully evaluate their affirmative action plan process in light of CSC's revised criteria and guidance and make any necessary changes needed to comply. We recommend also that they (1) provide the resources that might be required to handle increased agency responsibilities under the revised process and (2) reduce the need for resources by streamlining the process to the extent possible, with particular emphasis on making the process more than just a paperwork and paper shuffling exercise.

CHAPTER 7

RECRUITMENT

Federal agencies' efforts to attract women and minorities into their work forces have involved (1) focusing recruiting activities on women and minority candidates, (2) using minorities and women in recruiting programs, and (3) using specialized recruiting efforts.

These recruiting efforts may have contributed to the increase in the numbers of women and minorities in Federal employment. However, other factors, such as an increase in the number of women and minorities qualified for Federal jobs, increased general knowledge of the Federal employment system, and assurance of equal treatment, may have also contributed to the increase.

We were not able to identify the specific results of these recruiting efforts because the agencies had no information to show whether those recruited applied for Federal employment.

SPECIAL RECRUITING EFFORTS

CSC requires employing agencies to direct specific affirmative recruiting activities to minorities and women through:

--continued recruiting relationships with schools having large enrollments of minorities and women;

--contacts with minority and women's groups, including fraternities, sororities, alumni groups, professional societies, and special interest groups; and

--specialized recruiting literature directed to minorities and women.

Recruiting relationships

Recruiting activities at most of the installations we reviewed included contact with universities, colleges, high schools, and community groups, including many special interest groups for minorities and women. Although the primary thrust of the recruiting was at the college and university level, many recruiting and EEO coordinators maintained lists of groups made up of minorities and women, such as fraternities, sororities, and community organizations--as a recruiting source. At some installations these groups were used only to a limited extent because recruiters and EEO coordinators considered them nonproductive sources of minority and women candidates.

Recruiting activities varied greatly from installation to installation, depending on their hiring posture. Some recruiting programs consisted of public relations activities, whereas others actively sought job candidates.

Records--statistics, trip reports, cost and other information--on recruiting activities at most installations were sketchy and incomplete. The available records and comments by agency officials indicated, however, that a large portion of the recruiting effort was being directed toward minorities and women.

We estimated from the limited data available that 15 installations included in our review devoted at least 40 percent of their recruiting effort to minorities and women, that 2 of the 15 devoted almost 100 percent, and 10 of the 15 devoted 75 percent or more. One recruiting official said his agency did not recruit nonminorities because nonminorities were aware of Federal career opportunities and know how to get on the employment registers.

Minority and women participation

The number of recruiters and the race and sex of team members varied greatly from installation to installation. Generally, recruiting teams were a mixture of minorities and nonminorities and men and women.

Although members of an installation's personnel office usually coordinated recruiting programs, EEO staff or committee members at some installations participated in

--selecting recruiting sources,

--selecting recruiters,

--selecting applicants, and

--coordinating the recruiting program.

At installations of the Fish and Wildlife Service, the Forest Service, and the Social Security Administration in one CSC region, the recruiting program was coordinated and directed by the EEO coordinator.

Other programs directed at minorities and women

Some employing agencies recruited persons and hired them as part-time or nonpermanent employees; their nonpermanent status was converted to permanent status as vacancies occurred. Statistics generally were available on only full-time employees so we were unable to determine the numbers of women and minorities hired through this conversion practice. Officials at a Forest Service location told us, however, that this practice accounted for a large part of the installation's increase in minority representation.

Officials at a number of installations said that it was particularly difficult to find and/or hire minority and women candidates for certain job categories--such as natural resources jobs. A Forest Service region attempted to increase the number of potential candidates by working with a minority college to establish a curriculum leading to careers in natural resources. Some agencies conducted workshops and informational efforts designed to attract minorities and women to careers in the Federal Government.

Agencies should recognize, however, that qualification requirements for most professional jobs in Federal agencies do not call for college degrees or college majors in each of the professional job categories within the respective agencies. In fact, CSC qualification requirements for most professional jobs in the agencies we reviewed offered at least two or three options as to how an individual might qualify, as follows:

--A higher educational degree with a specific number of hours in the particular professional discipline.

--Some higher education or other academic experience wi a specific number of hours in the particular professional discipline and some responsible work experience.

--Work experience.

Additionally, an individual is not required to have a college degree in order to take CSC's Professional and Administrative Career Examination. Thus recruiting efforts should be based on an analysis of qualified labor supply that includes individuals who meet any of the three options.

Some activities of the General Services Administration and the Social Security Administration told us that they had previously used the Outstanding Scholar provision of the Federal Service Entrance Examination as a tool to achieve EEO goals calling for increased minority and women representation. The Outstanding Scholar provision permitted an applicant to be placed on the examination register with a deemed score of 100, without taking the written examination, if the applicant ranked in the top 10 percent of the graduating class or had at least a 3.5 grade point average. Officials at a Social Security Administration installation said a 90-percent minority hiring goal (90 percent of the 154 new employees were to be minorities) for one occupational category was attained in fiscal year 1974 largely through the Outstanding Scholar program. These officials said that at least 95 percent of all minorities hired in two occupations during calendar year 1973 were also obtained through this program. The EEO officer at the installation attributed the region's EEO hiring success largely to the Outstanding Scholar program. An official at the agency's headquarters stated that over 50 percent of the minorities recruited by the agency during fiscal years 1972-74 were hired under the Outstanding Scholar program.

However, under the Professional and Administrative Career Examination, which replaced the Federal Service Entrance Examination in late 1974, outstanding scholars, while still receiving substantial credit for their scholarship, now are required to compete in the written examinations with all other candidates and no longer receive a predetermined score of 100. Some agency officials believed that this change would have a significant adverse effect on their ability to reach minorities on CSC registers.

Most agencies participated in one or more of the many special student employment programs. The programs involved both high school and college students. Some agencies tried to use the programs as a tool for improving their minority and women profiles, but, since they generally did not keep records showing the number of student program participants who subsequently became full-time employees, we could not assess the results.

Recruiting literature

Recruiting literature of many agencies and activities was general in nature and content and was applicable to both sexes and all races. Some of the general literature contained a statement that the Federal Government is an equal opportunity employer. Some agencies had recruiting literature that focused specifically on women and minorities.

PROBLEMS IN RECRUITING MINORITIES AND WOMEN

The recruiting and hiring problems mentioned most frequently by agency personnel were:

--Few minorities and women qualified in the disciplines that the agency needed.

--Hiring freezes or funding limitations.

--Undesirable work locations.

--Inability of agency to compete with private industry.

--Veterans' preference.

Other problems mentioned were CSC's modification of the Outstanding Scholar provision in converting from the Federal Service Entrance Examination to the Professional and Administrative Career Examination, limited employee turnover, limited housing and transportation facilities at the job location, and insufficient information on the race, sex, and academic fields of enrolled students.

Despite these many obstacles, however, Federal agencies will have a continuing need to recruit prospective employees. Efforts must be carefully planned and conducted to identify present and future needs and to tailor recruiting efforts to meet these needs.

In continuing to make special recruitment efforts and in devising new ways to interest and attract prospective qualified candidates, agencies should have not only the full support but also the active involvement of CSC. We believe that CSC should work closely with agencies in joint efforts for increased recruiting effectiveness.

We noted that in January 1976 the Department of Labor and the Department of Health, Education, and Welfare agreed to seek ways to increase the number of minorities and women in academic jobs. In a joint announcement the Secretaries said the two departments would review existing regulations to seek to expand job opportunities for minorities and women and would explore with other public and private agencies ways to increase the number of minorities and women qualified for academic posts. We believe that a similar effort by CSC with Federal agencies would result in a more coordinated and cohesive attack on the problems of recruitment and could produce beneficial results. We also recognize, however, that the problem is a sophisticated one, not merely a matter of agencies simply doing more and more recruiting. For example, minorities and/or women may be underrepresented in certain occupations for which there are abundant or overabundant supplies of candidates already on CSC's registers. In such cases, caution might have to be used in short-range recruiting or in the long-range program of encouraging large numbers of additional persons to enter those occupational categories.

CONCLUSIONS

Federal agencies have made special recruiting efforts to attract women and minorities. These efforts may have contributed to increasing the numbers of women and minorities in the Federal work force. Specific results were not identifiable because those recruited were not tracked.

Agencies still face problems in their recruiting efforts--scarcity of women and minorities for some disciplines, hiring freezes or funding limitations, and competition from other sectors of the employment market, such as private industry.

We believe these recruiting problems make it imperative for agencies to carefully plan and conduct their recruiting programs. For those occupations with limited numbers of women and minorities, agencies could consider broadening their array of approaches, such as advising students of the types of academic disciplines used, the types of work the agencies do, and the benefits of Federal employment.

Accordingly, we proposed that the Chairman, CSC, commit his agency, as part of its role of providing leadership for Federal personnel administration, to increased involvement in the critical task of increasing the numbers of minorities and women qualified for Federal employment by seeking ways to expand job opportunities and by taking an active role in identifying and recruiting qualified minorities and women for Federal jobs.

AGENCY COMMENTS

CSC stated that, to be completely responsive to our proposal, it would be necessary for it to know the extent to which its registers of eligibles have representative proportions of minorities and women in occupations in which qualified eligibles are sought by Federal agencies.

(See app. I.) CSC said a tracking system would help it to be more certain in knowing that it was doing an adequate job. CSC believed it was working to accomplish our proposed action. (See our recommendation concerning the need for a tracking system on p. 64.)

The Department of the Treasury stated that it supported a more active role by CSC in recruitment. The Treasury also suggested increased CSC efforts in encouraging high school and college students to prepare for and seek Government employment. (See app. IX.)

CHAPTER 8

EVALUATING EEO PROGRAMS

Executive Order 11478 and the Equal Employment Opportunity Act of 1972 require CSC to review and evaluate agency EEO programs. Also, the Executive order and Federal personnel regulations require agencies to periodically evaluate the effectiveness of their own EEO programs. Although we did not make an indepth appraisal of the adequacy and effectiveness of evaluative techniques and systems, it appears that CSC and the agencies are taking positive actions to evaluate EEO efforts.

CSC'S EVALUATION ROLE

CSC's Bureau of Personnel Management Evaluation in Washington, D.C., and its regional Personnel Management Evaluation Divisions are responsible for evaluating personnel management, including EEO efforts, at about 4,000 Federal establishments which employ 50 or more persons.

CSC makes two major types of evaluations--general and special. General evaluations examine a wide range of personnel management matters and may include a review of EEO. Special evaluations focus on specific aspects of personnel management and often cover EEO. About 300 to 600 general and special evaluations--up to 15 percent of the installation subject to CSC review--are made annually. CSC told us that in fiscal year 1976, 74 percent of the nearly 350 evaluations made covered EEO matters; additionally, reviews of agency personnel management evaluation systems (systems reviews) also touched upon EEO.

Although CSC stated that it invited agencies to assign staff members to participate in its evaluations, agency personnel frequently did not participate. CSC believes that agency participation is beneficial because it facilitates the evaluation, provides for an exchange of evaluative techniques, and offers training benefits to agency personnel. Agency personnel we interviewed generally considered participation in CSC evaluations to be helpful. Some agencies stated that they were reluctant to participate, however, because of a shortage of trained personnel or perceived potential problems of conflicts of interest.

CSC takes a problem-oriented approach in its evaluations. Facilities are selected for review based on such factors as time elapsed since prior review, results of prior review, proposed agency internal evaluation efforts, and how severe CSC believes agency personnel management problems are. The existence of any EEO problems is also considered in scheduling evaluations.

Before a general or special evaluation is made, CSC evaluators request agencies to provide organizational, personnel management, and work force data for familiarization and analysis. Basic onsite techniques include interviewing agency officials, examining personnel records and other documents, and sampling employee attitudes. CSC reports its findings, recommendations, and required actions in writing to the agency. Reports are problem oriented, calling matters needing correction or improvement to the attention of agency managers.

CSC indicates that it has been devoting increased effort, primarily through systems reviews, to assessing and suggesting improvements to agency internal evaluation systems and capabilities, including EEO matters. According to CSC, 89 systems reviews were made in fiscal year 1975 and 122 were released in fiscal year 1976. CSC also advised us that it participated in agency-led internal evaluations and had been modifying its role in these evaluations by having CSC participants do more to assess agency review techniques, rather than merely assisting in the agency review.

CSC's EVALUATIONS OF AGENCY EEO PROGRAMS

According to CSC, review of EEO has been a regular part of its evaluations since 1961. CSC indicated that the 1972 act did not necessitate a totally new approach to evaluating EEO but did require that the depth and intensity of evaluations be extended.

Extent of EEO coverage

Data prepared by CSC showing the proportion of total evaluation resources devoted to EEO coverage in recent years appears below.

	Fiscal year				
	1972	1973	1974	1975	1976
Total obligations (thousands)	$3,972.0	$4.638.4	$5,374.4	$5,733.8	$6,958.0
EEO obligations (thousands)	$ 584.4	$1.278.5	$1,431.9	$ 843.2	$ 838.6
Percent of EEO to total	14.7	27.6	26.6	14.7	8.2
EEO staff-years	32.0	66.5	64.5	34.7	33.0

CSC representatives explained that the decline in EEO resources in 1975 resulted from a shift to conducting systems reviews. This change absorbed resources which normally would have been spent on evaluations covering EEO. CSC believes that, because EEO is an important part of systems reviews, the decline in resources devoted directly to EEO is not as severe as the statistics indicate.

Another reason for the decline, according to CSC, is that a major EEO study scheduled to begin in fiscal year 1975 was canceled. The study, which was to require about 8 staff-years of effort, had as its primary objective the identification of barriers in selected agencies which limit progress in increasing minority and women representation in professional/administrative occupations.

A major reason for canceling the study, according to CSC, was the relatively little growth in minority employment from November 20, 1972, to May 31, 1974 (an average of 1 percent for the 20 selected major agencies for the period) and insufficient differences in growth between agencies to enable CSC to distinguish between the impact of various barriers and to identify the more successful techniques to overcoming the barriers.

In February 1977 CSC said it was planning to revive the study. It believes that enough time now has elapsed to successfully track major changes in work force population characteristics and, even more important, the reasons for the changes.

It appears that in general, EEO evaluation efforts have been considerable. About two-thirds of the field installations we visited had undergone a CSC evaluation since March 1972 which either dealt specifically with or included EEO.

EEO evaluation guidelines

CSC established revised EEO evaluation guidelines in December 1972. The guidelines set out evaluation objectives, purposes, approaches, methodology, reporting techniques, and instructions for evaluating special emphasis areas, such as EEO for women. Evaluations are to be action oriented, aimed at achieving change and improvement. They involve two separate but closely related objectives:

--Eliminating intentional and unintentional discriminatory patterns and practices.

--Insuring that agencies are commented to realistic and meaningful affirmative action.

CSC issued supplementary guidelines for its evaluators in March 1974, describing its enforcement authority and providing guidance for recognizing discrimination and directing compliance and corrective action. A large part of the guidelines focuses on specific examples of discrimination and the appropriate corrective action CSC can order. Periodically, additional guidance may be issued to update and amplify the guidelines. CSC regional Personnel Management Evaluation Division chiefs believe that the guidance for evaluating EEO is adequate.

Criteria for assessing the adequacy and effectiveness of agency EEO efforts include such factors as

--compliance with EEO laws and regulations,

--adequacy of resources devoted to the program,

--nature of management and employee attitudes,

--reasonableness of affirmative action plan goals, and

--effectiveness of internal evaluation systems.

EEO evaluation techniques

Evaluations usually begin with a CSC request for such information as a copy of the agency's EEO plan; a description of the agency's internal EEO evaluation procedures and statistical systems; and data on training, complaints filed, and upward mobility. CSC also requests data on work force and personnel actions (such as hirings, promotions, and terminations) by sex and by race.

CSC evaluators are to determine the scope and direction of the review based on the circumstances and problems of the particular agency. During the onsite phase of the evaluation, CSC representatives

--interview agency managers and officials of the personnel office and EEO program and

--analyze personnel records, statistics, and other documentation, including internal studies of the EEO program.

CSC also samples employee attitudes on EEO through a questionnaire which was designed for use in special evaluations dealing with EEO. The questionnaire, which was used about 90 times in a recent 1-year period, asks employees' opinions on a variety of topics, such as whether all employees are being treated fairly and whether the agency is making a genuine EEO effort. Results are tabulated by sex and by race.

A CSC representative told us that EEO reviews had been placing more emphasis on evaluating substantive as opposed to procedural aspects of the program. Increased efforts are being devoted to evaluating how well agencies are implementing their affirmative action plans and examining the results achieved.

CSC evaluation reports

Reports of personnel management evaluations we examined at Federal installations and CSC regional offices dealt with a wide variety of EEO program areas and activities. Many of the reports commented on the low representation of minorities and the need for more extensive and effective recruiting efforts. Several reports pointed out the need for agencies to devote more staff and resources to EEO and to fully develop special emphasis programs, such as the Federal Women's Program and upward mobility. Several CSC regional Personnel Management Evaluation Division representatives cited ineffective upward mobility programs as a major EEO problem area in the agencies.

Evaluation reports also commented on, and called for improvements in,

- --rating supervisory EEO performance,
- --evaluating EEO progress,
- --training EEO staff and supervisors, and
- --counseling employees.

Although reports point out deficiencies and suggest or require improvements, they also comment on the positive aspects of agency programs.

Agencies are given 90 days to respond in writing to evaluation reports. According to CSC officials, the nature of the response, severity of the findings, past experience with the agency, and availability of CSC resources dictate whether CSC will make an onsite followup.

CSC periodically prepares agencywide studies of EEO based on consolidations of installation-level evaluations and a review at agency headquarters. We examined four such reports and found that they called for improvements in managerial and supervisory support for EEO, upward mobility, internal evaluation, use of EEO committees, recruitment, and special emphasis areas.

Agency representatives generally believe that CSC's evaluations are beneficial in that they provide an independent review of EEO efforts and help to identify program weaknesses. But some agency representatives criticized the evaluations on the grounds that they were cursory and the recommendations lacked specificity.

CSC representatives indicated that the major benefit of evaluation is that it has motivated agencies and helped them correct EEO-related problems.

AGENCY INTERNAL EVALUATION EFFORTS

CSC guidance and oversight

CSC has provided agencies with a considerable amount of information and guidance on internal personnel management evaluations in general and internal evaluations of EEO in particular.

In July 1969 CSC published an appendix to the Federal Personnel Manual, chapter 713, which included suggested evaluation methods and specific EEO program areas to be considered during evaluations. Further guidance was provided in a CSC pamphlet, the 1974 edition of which lists the four major objectives of internal EEO evaluation as

--assessing management's effectiveness in identifying factors and problems bearing on EEO,

--reviewing implementation of action plans to meet and overcome obstacles to full equality of opportunity,

--providing management with recommendations or directions for remedial actions, and

--assuring that action has been taken on recommendations and directions.

The pamphlet discusses evaluation approaches and methods as well as EEO problem identification and solution techniques. According to the pamphlet, internal EEO evaluations should include assessments of agency progress and results in 13 affirmative action plan elements. However, while the pamphlet indicates that every agency should have some system for evaluating EEO, agencies are not expected to adopt every suggested approach or procedure.

In 1972 CSC transmitted to agencies copies of its new EEO evaluation guidelines which were prepared for the use of CSC evaluators. Agencies were asked to provide copies to EEO program personnel and to other personnel who have EEO evaluation responsibilities.

In its instructions on developing affirmative action plans, CSC has also provided guidance and emphasized the need for internal EEO evaluations. Agencies are required to prepare assessment reports of the current EEO situation and to prepare accomplishment reports showing whether specific items in the most recent plans were accomplished, and, if not, why. The results and impact of the prior year's EEO actions are also to be reported. Further, a system for internal EEO evaluation is required as one of the eight EEO plan elements.

In addition to guidance relating specifically to EEO, CSC has published information in chapter 250 of the Federal Personnel Manual regarding agency internal evaluations in general.

The adequacy of agency internal EEO evaluation systems may be assessed during CSC personnel management evaluations. For example, the four agencywide EEO studies we examined included consideration of internal EEO evaluations. Generally the reports recommended that additional resources be devoted to identifying EEO problems and that line managers and supervisors be given greater evaluation responsibilities.

As discussed above, CSC has placed emphasis on insuring that agencies develop and implement effective internal personnel management evaluation systems. According to CSC, one of the major concerns in its assistance and monitoring efforts is to insure that agency systems provide for EEO evaluations.

Agency internal evaluations

It appears that, although CSC guidance on internal evaluations provides agencies with many useful evaluation suggestions and alternatives, there is no specific guidance as to exactly what type of evaluation CSC considers as a minimum requirement. It is not clear, for example, whether properly developed affirmative action plan assessment and accomplishment reports constitute valid and acceptable forms of internal EEO evaluation or whether such evaluation must occur through a separate review or audit.

Our review showed that agencies are employing a wide variety of EEO evaluative techniques and approaches and that assessments differed as to scope and depth. Among the methods used were

--periodic statistical or narrative reporting,

--assessments in connection with affirmative action plan development,

--visits by EEO officials,

--onsite evaluations dealing specifically with EEO or including EEO as part of broader reviews,

--monitoring by EEO advisory committees, and

--sampling employee attitudes through the use of questionnaires.

Many of the agency assessments we reviewed were in the nature of activity reports which showed, usually statistically, what was done and what resulted rather than being an evaluation of goals versus accomplishments, reasons for shortfalls, and remaining problems.

We also reviewed several studies conducted by headquarters personnel of local EEO efforts. Among other things, the studies noted the need for improved communications and feedback, additional resources, greater understanding of EEO, recognition of managers and supervisors who support EEO, greater numbers of women and minorities in the work force, program direction, and training.

CONCLUSIONS

CSC has been making an effort to assess EEO programs through its onsite personnel management evaluations. These reviews are useful tools in that they provide an independent assessment of agency efforts and a means for identifying and correcting problems of program weaknesses.

Agencies are using a variety of internal EEO evaluation techniques. CSC guidance, although abundant and presenting many useful alternative approaches, does not clearly define what constitutes acceptable EEO evaluations at the various levels of an agency.

AGENCY COMMENTS

CSC disagreed with our findings, stating that a minimum standard of adequacy in EEO evaluation does exist for each agency, but the standard is and ought to be relative to a number of agency variables--such as resources available in an agency, size of the agency, and progress in EEO to date--rather than an absolute set of requirements for all agencies. (See app. I.) CSC said it believed it would be a mistake to prescribe specific and standard methodologies for all agencies regardless of differences among them in their overall management evaluation approach.

CSC believes that EEO should not be thought of as a separate program consideration which is not an integral part of everyday personnel management activity. EEO considerations, according to CSC, must be part and parcel of all personnel management decisions, and actions taken to carry out these decisions must be evaluated, in part, on the extent to which they are supportive of EEO. CSC also stated that:

> "We believe the more productive approach is to emphasize incorporation of EEO evaluation methodology into reviews of staffing, recruitment, merit promotion, and other personnel programs, rather than to prescribe separate guidelines for the conduct of EEO reviews. To further equal employment opportunity in personnel management and administration, which is where equal opportunity has to happen, the evaluation function should not treat these as distinct areas. It is our impression that the agencies do not need more policy guidance on what EEO evaluation is supposed to be. Some of them do need innovative approaches to the operational integration of EEO principles into the total evaluation systems, and we believe the Commission's efforts should be aimed in the direction of providing advice and assistance in this regard."

We recognize that in many instances EEO program evaluations logically would be only a part of broader evaluations of personnel management and administration. Whether the EEO evaluation is performed as part of or separately from any broader evaluation, however, minimum standards for such evaluation are necessary. Such standards are not clearly stated at this time.

The Department of Health, Education, and Welfare generally concurred in our finding and proposal. (See app. V.) It believes that CSC should set monitoring priorities and determine what it wants to monitor and why.

The Department of the Treasury, in commenting on our proposal for CSC to establish minimum EEO program evaluation requirements, stated (see app. IX) that it

> "* * * is in complete agreement with this recommendation. Currently, there are no adequate standards available on a government-wide basis, to measure program effectiveness."

Although CSC has stated, and we agree, that its guidance on agency internal evaluations is abundant, the guidance may have to be implemented, particularly at field installations, by agency personnel who are not specialists in internal management reviews or personnel evaluations. The multiplicity of evaluation techniques and differences in the quality and usefulness of the assessments and reports we examined, many of which were not evaluations at all but, rather, activity or progress reports, indicates a need for more guidance from CSC on this critical aspect of self-evaluation. So do the responses from the agencies, most of which concurred in general or in specific comments on the need for CSC to establish minimum EEO program evaluation requirements.

RECOMMENDATION TO THE CHAIRMAN, CSC

We recommend that the Chairman issue more definitive guidance, perhaps through a synthesis of existing published materials, which would set forth minimum agency EEO evaluation requirements.

CHAPTER 9

PROBLEMS IN EVALUATING EEO PROGRESS

As stated earlier, we were unable to assess the adequacy and reasonableness of progress made by Federal agencies and CSC in carrying out affirmative action under the EEO program because the agencies and CSC lacked criteria defining program objectives in measurable terms. However, even if quantifiable program objectives had been established, evaluation efforts would have been hindered by

- --the absence of sex and race identification of those entering the Federal hiring process (see chs. 3 and 5),
- --the lack of reliable and current statistical data (see ch. 3), and
- --the inadequate data on program costs (see ch. 4).

SEX AND RACE OF ELIGIBLES ON CSC REGISTERS NOT IDENTIFIED

A CSC official said that the source of virtually all Federal employees in the competitive service is the CSC registers. But the sex and race of eligible candidates on CSC registers are not identified. Thus, although we could determine the numbers of women and minorities hired, we could not determine what proportion of them were eligible candidates on the registers or if hiring results were those which could reasonably be expected. In our opinion, this information also precludes CSC and agency officials from identifying registers with limited numbers of women and minorities, directing recruiting efforts to problem areas, setting appropriate recruiting and hiring goals, and realistically assessing recruiting and hiring results.

In its February 9, 1976, Bulletin 330-41 to heads of agencies on Federal staffing trends, CSC indicated that Federal competitive hiring over the past several years had fluctuated sharply in reaction to variations in budgetary and economic conditions and changes in Federal responsibilities. The bulletin showed that new employees, nationwide, totaled about 179,000 in fiscal year 1973, 231,000 in 1974, 193,000 in 1975, and were forecast at 176,000 for fiscal year 1976. Given this fluid hiring picture, it is essential, according to CSC, that agencies give attention to relating their recruitment activities to CSC inventories of eligibles and to directing their recruitment programs to specific needs. To assist agencies, the bulletin contained a critique of past hiring trends and the employment outlook for various occupational groupings. Regarding EEO efforts, the bulletin stated that:

> "The information contained in this Bulletin should be useful to agencies in planning their EEO recruitment program. Recruiters should concentrate their EEO efforts on those occupations which, given agencies' projected needs and the supply of competitors in our inventories, offer the best chances for employment. In order to assure that agencies' EEO recruitment plans accurately reflect the current status of our competiror inventories and are timed to coincide with periods of open competition, recruiters should work closely with appropriate Commission offices when scheduling their activities. This should lead to a more positive results-oriented EEO recruitment program and improve communications among applicants, recruiters, and examining offices." (Underscoring supplied.)

Since CSC does not maintain EEO-related data on the race or sex of competitors in its inventories (registers), there appears to be no practical way that agencies can comply with the CSC request.

LACK OF RELIABLE AND CURRENT STATISTICAL DATA

Since CSC registers do not show the numbers and percentages of qualified women and minorities available for Federal employment, agencies used various methods and data to determine the extent of underrepresentation of women and minorities and their availability in the work force. The data most commonly used for assessing labor resources was from the U.S. census of 1970. CSC also suggested that agencies use other means of assessing potential labor supply, such as HEW data on earned degrees conferred.

Data from these sources was not timely or complete, although, as far as we could determine, it was among the best data available. CSC noted that the census data did not include information on American Indians or Orientals and that its definitions of minorities and occupations for the entire population differed from those used by CSC to describe Federal civilian employees. The most current data on degree recipients was for the 1971-72 school year and was only for women.

We located data on potential labor supply other than that suggested by CSC. Although this data was generally no more current or complete than CSC's suggested data, it did offer additional information for consideration. For example, one publication of the Department of Health, Education, and Welfare's Office for Civil Rights showed the racial and ethnic enrollment of all responding institutions of higher education receiving or expecting to receive Federal financial aid or assistance. 1/ This data was shown by State for each institution and covered each of the four largest minority groups--Black, Spanish-surnamed, American Indian, and Oriental. Also, it presented information on enrollments as of 1968, 1970, and 1972 which could enable general trends to be noted.

Agency statistics not complete or reliable

The accuracy or completeness of some agencies' work force statistics seemed uncertain. Some comments installation officials made follow.

> "Statistical information reports are inaccurate * * * minorities are not correctly identified and * * * there are transcribing errors in the computer inputs."
>
> "EEO workforce status reports were of no use to management because they gave no breakout by grade level or organizational unit."
>
> "Statistics available often were too detailed to be usable and some needed information was not provided or was inaccurate."
>
> "Separate reporting on women and minorities caused problems in trying to make workforce analysis and made it necessary to make special surveys to obtain statistics on work force composition."

We did not verify these statements, but we did determine that agencies' EEO information systems were not complete and their accuracy was questionable. For the 10

1/This publication stated that all institutions of higher education receiving or expecting to receive Federal financial assistance were asked to report, but we could not determine if all did respond.

agencies we reviewed, only 7 kept statistical information on accessions, 6 on promotions, and 3 on separations. One Postal Service installation we reviewed maintained two reporting systems which contained statistical information on women and minorities. One of these systems was used as the primary EEO reporting device. In reports dated 1 month apart, one system reported that minorities comprised 46 percent of the work force, whereas the other reported that they comprised 56 percent of the work force. An EEO official said that he was aware of the discrepancy but couldn't really explain it.

CSC work force data base not complete or accurate

The data base CSC provided to us did not contain complete information for all Federal employees. This lack of complete data hindered our efforts to analyze the changes over time in the work force. Although we determined what data was missing or erroneous--for example, minority designation, sex designation--we had no assurance that the omissions were randomly distributed across both sexes and the various minority groups, pay plans, and grade or pay levels.

We requested in August 1975 that CSC furnish us with magnetic tapes containing the following EEO data.

--Minority group designator.

--Sex.

--Pay system.

--Grade.

--Salary.

--Occupation code.

--Personnel action code.

--Agency bureau level.

--Geographic location code.

This data was to provide the status of employment at May 31, 1973, and February 28, 1975, and accessions, separations, and promotions for this period.

The magnetic tapes containing the requested data were received in December 1975. Since it was our intention to confine the study to Federal employees stationed in the United States, we excluded employee files from other geographic areas.

The CSC data was edited on the computer to eliminate records containing invalid or incomplete data elements. As a result of this edit, we excluded records as follows:

	CSC records		
	Status as of 5/31/73	Status as of 2/28/75	Transactions 5/31/73 to 2/28/75
Total record count	2,492,808	2,770,268	2,722,391
Less: Outside U.S.	98,426	76,773	120,465
Less: Aleuts and Eskimos	1,074	1,569	3,163
Records reviewed	2,393,308	2,691,926	2,598,763
Excluded:			
Missing or erroneous minority designation	145,199	46,765	89,123
Missing or erroneous sex designations	2,075	5,378	13,926
Missing or invalid occupation code	17,560	20,232	-
Exceed salary of $75,000	10,503	5,540	172
Nonnumeric grade	5,263	3,026	23,178
Nonnumeric salary	-	-	24,265
Other	472	375	1,646
Total excluded	181,072	81,316	152,310
Percent of total reviewed	7.6	3.0	5.9
Net records used	2,212,236	2,610,610	2,446,453

CSC officials attributed the missing and erroneous data to

- --delays in receiving complete data from some agencies,
- --startup problems with the system, and
- --problems encountered in merging its Minority Group Designator File with its Central Personnel Data File.

They said they were continuing their efforts to get more timely and accurate data from the agencies, and CSC plans to merge the two files.

LACK OF RELIABLE COST DATA

Federal agencies have not implemented systems to capture accurate, reliable information on EEO program costs. Without such information, difficulties are encountered in

--projecting future costs,

--measuring cost/benefits of the program, and

--making comparative analyses of costs and patterns of success or failure.

CONCLUSIONS

Our efforts to assess the adequacy and reasonableness of progress toward meeting EEO goals were limited by the lack of current, accurate, and complete data. This lack of data, we believe, also precludes Federal agencies and CSC from setting realistic program goals or from accurately measuring progress.

On September 3, 1976, we sent the Chairman, CSC, a letter indicating there was a need for an integrated Federal agency EEO management information and evaluation system. Such a system would be designed to correct the data and statistical information problems cited throughout this report. In its September 20, 1976, reply, CSC indicated it was in full agreement on the desirability of a more systematic approach to satisfying the EEO program information needs of CSC and other Federal agencies. CSC again responded on April 4, 1977, outlining actions it had taken or was planning to take on this matter. We will be in periodic contact with CSC to assess progress.

UNITED STATES CIVIL SERVICE COMMISSION
WASHINGTON D.C. 20415

Mr. H. L. Krieger
Director, Federal Personnel and
 Compensation Division
United States General Accounting Office
Washington, D. C. 20548

Dear Mr. Krieger:

Thank you for the opportunity to comment on the draft General Accounting Office report titled: "Status of Efforts to Provide Equal Opportunity in Federal Employment: An Interim Progress Report." We appreciate the attention you have given this vital program. We agree in your assessment that, while significant gains have been recorded, much remains to be done in achieving full equality of employment opportunity throughout the Federal Government.

Our comments are attached. I am sure you will give them careful consideration in the preparation of your final report.

Sincerely yours,

Raymond Jacobson

Raymond Jacobson
Executive Director

Enclosure

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COMMENTS ON

GENERAL ACCOUNTING OFFICE DRAFT REPORT

"Status of Efforts to Provide Equal
Opportunity in Federal Employment:
An Interim Progress Report"

Office of Federal Equal Employment Opportunity

U. S. Civil Service Commission

November 1976

As background for our comments on this draft report we believe it appropriate to review some of the circumstances impacting on agency efforts to develop EEO plans and programs.

Four years after the passage of P. L. 92-261, the Federal community and the Congress are still debating about the meaning, intent and goals of EEO in the public sector; longitudinal studies have not yet pointed to optimal organizational patterns for EEO administration; considerable difference exists in the definition and application of affirmative action; more recently, and more frequently, the courts have been shaping policy, goals, methodologies, and outcomes of Federal agency EEO programs. Further, as you are well aware, every aspect of the program pervades and impacts on the total breadth of the Federal employment system demanding that equal opportunity in employment become a reality at every Federal location throughout the nation. It is remarkable, therefore, that the recorded gains have been substantial in such a relatively short period of time. Such progress is indeed evidence of the general commitment of Federal managers and employees to an ideal and to making the program work. We believe that it is against this backdrop that the findings and recommendations of this report must viewed.

Our comments on the specific recommendations contained in the GAO report are as follows:

Recommendation

Study agency EEO organizational patterns and practices; advise agencies of criteria for organizational arrangements and the conditions under which each is likely to result in maximum effectiveness. Advise agencies to avoid duplication of effort and to maximize cooperation and coordination among agency components. (page 65)

Comment

We agree that there is now an experiential base for a study of organizational patterns for the administration of EEO programs. In several reviews of the approaches taken by agencies, we have identified some organizational relationships which we believed were less effective than others in furthering EEO. We agree that a comprehensive study is now in order and expect to begin the planning stage in the second quarter, FY 1977.

Recommendation

Establish regulations requiring that components of EEO costs be comprehensively and uniformly accounted for. (page 65)

Comment

We believe that the cost report charts contained in Attachment 1 to FPM Letter 713-35 will provide adequate cost data on each of the major EEO program components. Based on review by and comments from agency officials, we believe that these program components are discrete and measurable, and that reportable cost units can yield more uniform government-wide totals in each major program element. Based on our experience with FY 77 cost reports, we will issue any additional instructions to agencies which may be needed for improvement of reporting practices in subsequent submission cycles.

Recommendation

Shift emphasis of agency goal-setting from hiring (selection) to recruitment. (page 80)

Comment

We believe that it is not so much a matter of changing emphasis as taking proper account of the recruiting market and recruiting needs in developing hiring goals.

It is important that agencies work closely with Commission area offices to ensure that no recruiting is undertaken for positions where there is already more than an adequate supply of candidates or where in fact registers are closed. The report makes note of this on page 103;

> "We also recognize, however, that the problem is... not merely a matter of agencies simply doing more and more recruiting. For example, minorities and/or females may be underrepresented in certain occupations for which there are abundant or overabundant supplies of candidates already on CSC's registers. In such cases caution might have to be used in short range recruiting or in the longer range program of encouraging significant numbers of additional persons to enter those occupational categories."

Many of our area offices are now working under the Managed Approach to Recruitment (MAR). Applications for positions are accepted on an as-needed basis, based on agencies' projected new hire estimates. If there is a need for applicants, the area offices announce the positions, usually through their Job Information Centers. This would be the point where additional affirmative action outreach recruiting efforts could be effectively undertaken; Commission offices and the agencies might coordinate their recruiting efforts in these situations to provide a large supply of candidates which would hopefully be reflective of the available candidate population in terms of race, ethnic origin and sex.

Recommendation

Devise a system for tracking applicants by race and sex through the register to selection or rejection. (page 79)

Comment

On November 23, 1976, the Civil Service Commission adopted the Federal Executive Agency Guidelines on Employee Selection Procedures which require agencies to determine whether procedures used in the selection of applicants for Federal employment result in disparate treatment of racial or minority groups. Preliminary plans are being made for the development of a tracking system but several problems remain to be solved. When GAO made a similar recommendation in a 1975 report entitled "NASA's Equal Employment Opportunity Program Could Be Improved", the Commission stated that it was looking into the feasibility of such a system and outlined a number of issues connected with implementation. Principal among them is how to gather accurate data without asking applicants for racial or minority identification. Requesting such information is now prohibited by Civil Service Rule 4.2. We have begun to explore the possibilities of tracking samples of applicants and to gather cost estimates for both sample and total applicant populations. Since many variables are involved it would be difficult at this time to estimate when preliminary data would be available for analysis. We understand that GAO is working on a tracking system for its forthcoming study of the impact of veterans preference on minority and female hiring. GAO's experience should prove helpful to us.

Recommendation

Issue a more definitive statement which would specifically set forth agency EEO evaluation requirements. (page 118)

Comment

We are somewhat puzzled by the recommendation on page 118 which calls for a definitive statement by the Chairman specifically setting forth agency EEO evaluation requirements. GAO concedes that the Commission has made available to all agencies abundant and useful alternative approaches to EEO evaluation but states that the Commission has not defined exactly what constitutes acceptable EEO evaluations at the various organizational levels of an agency. We disagree with both the conclusion and the recommendation and we offer the following information to explain our objections.

The minimum requirements that GAO refers to for conducting EEO evaluations must be an integral part of any agency internal personnel management evaluation system. That is, the agency evaluation staff must take positive steps to build effective EEO evaluation methodology into their total evaluation system regardless of its final form. Each of these agency systems is under constant review by BPME both to determine adequacy and to assess relative effectiveness. The Bureau of Personnel Management Evaluation does therefore assess the adequacy (i.e., minimum requirements) of each EEO evaluation system as it is a part of the total evaluation system. Thus, a minimum standard of adequacy in EEO evaluation does exist for each agency, but the standard is and ought to be relative to a number of agency variables--resources available in an agency, size of the agency, progress in EEO to date, etc--rather than an absolute set of requirements for all agencies. We believe this is a practical and proper approach. Where any agency's EEO evaluation system is judged to be inadequate in relation to the agency's circumstances, correction is required by our evaluation managers.

Further, we believe it would be a mistake to prescribe specific and standard methodologies for all agencies regardless of differences among them in their overall personnel management evaluation approach. EEO should not be thought of as a separate program consideration which is not an integral part of everyday personnel management activity. EEO considerations must be part and parcel of all personnel management decisions and actions taken to carry out these decisions must be evaluated in part on the extent to which they are supportive of equal employment opportunity. We believe the more productive approach is to emphasize incorporation of EEO evaluation methodology into reviews of staffing, recruitment, merit promotion, and other personnel programs, rather than to prescribe separate guidelines for the conduct of EEO reviews. To further equal employment opportunity in personnel management and administration, which is where equal opportunity has to happen, the evaluation function should not treat these as distinct areas. It is our impression that the agencies do not need more policy guidance on what EEO evaluation is supposed to be. Some of them do need innovative approaches to the operational integration of EEO principles into the total evaluation systems, and we believe the Commission's efforts should be aimed in the direction of providing advice and assistance in this regard.

[See GAO note 1, p. 107.]

Recommendation

Reexamine criteria for designating which agency components must submit EEO plans; require plans from major subordinate level components; provide more uniformity in requirement for regional plans. Increase delegation of plan reviews to agency headquarters; review agency plans on sample basis. (page 96)

Comment

This we have done. Our memo to EEO Directors and Personnel Directors dated June 7, 1976, and a CSC bulletin to be published soon prescribe criteria to ensure that plans are submitted on national, major subordinate command, and installation levels in a uniform manner. Included are elements of a modified plan prepared by agencies having fewer than 100 employees and a list of the major subordinate organizations required for the first time to submit plans. We believe that these guidelines will strengthen our ability to act in a more unified manner and provide flexibility when needed in local situations. Additionally, these new criteria will enable us to plan more precisely for workload demands, to schedule EEO staff involvement in evaluation of agency programs, and to focus technical assistance and follow-up efforts on those installations where the need is greatest. Further, we estimate that these new guidelines will reduce the number of regional/installation plans submitted to CSC offices by as much as 50 percent. In many cases this will increase plan review activity at agency headquarters and major subordinate organization levels.

Recommendation

Enlarge numbers of minorities and women qualified for federal employment in all job categories and at all grade levels by expanding job opportunities and by taking an active role in identifying and recruiting qualified minorities for Federal jobs. (page 104)

Comment

To be completely responsive to this recommendation, it would be necessary for the CSC to know the extent to which the registers of eligibles have representative proportions of minorities and women in occupations in which qualified eligibles are sought by Federal agencies. The Commission has always been aware of its responsibilities to enlarge the pool of eligibles. We have done this by recruiting at universities and colleges with large enrollments of minorities and women, by participating in specialized community recruitment campaigns which were attended primarily by minorities and women, and ensuring that agency recruitment literature reached community organizations which were in contact with minority and women students. As the number of minorities and women on the college campuses has increased, we believe that the potential pool of eligibles will also increase. As stated earlier, a tracking system will help us be more certain in knowing that we are doing an adequate job. We believe we are working to accomplish this recommendation.

Recommendation

Hold comprehensive discussions with field and headquarters agency officials, interested groups, and, as appropriate, the Congress to resolve conflicting views concerning fundamental issues of EEO. (page 153)

Comment

We agree that open lines of communication with all concerned parties are essential if the goals and fundamental concepts of EEO are to be understood and the program implemented in an effective and consistent manner. We have attempted to do this and are continuing to strive for full understanding of EEO principles in a number of ways. We realize that our publics are many and varied and that we must provide for a continuing dialogue with all of them and, in fact, with others we have not yet reached.

The Federal community is provided a forum through the Interagency Group (IAG) structure. The IAG Committee on EEO, consisting of agency Directors of EEO, meets quarterly to discuss fundamental issues on which it has received preliminary materials, CSC guidance or regulations. Policy and program areas are further explored by either standing or ad hoc sub-committees. Specific issues such as definitional or procedural concerns are referred to work-groups for investigation and feedback through the sub-committee to the plenary group. A similar communication network operates in each of the Commission's ten regions through the Federal Executive Boards (FEB),Federal Executive Council (FEC) and Federal Executive Associations (FEA).

Additionally, as you know, our special emphasis program offices are in immediate touch with the Spanish-speaking community and with the leaders of women's groups and constituency of the Federal Women's Program. We are also in contact with other minority groups such as Asian-Americans and American Indians. We meet frequently with leaders of various other organizations representing the interests of the Black community.

Finally, our many and frequent contacts with Members of Congress have conveyed our perceptions and often our frustrations in dealing with the fundamental issues of EEO. We concur with your view that all channels of communication must be kept open and that the views and experiences of officials in the field must be solicited. We believe that these channels have been kept open and that valuable feedback has contributed substantially to new or revised regulations, requirements, procedures, and policy guidance. We expect to keep this forum active and to build upon its valuable contacts and relationships toward the resolution of major program issues.

GAO notes:

1. Deleted material suggested minor changes in final report. We have considered these changes in this report.
2. Page numbers mentioned refer to the draft report and may not correspond to those in this final report.

DEPARTMENT OF AGRICULTURE
OFFICE OF THE SECRETARY
WASHINGTON, D. C. 20250

October 20, 1976

Mr. Henry Eschwege, Director
Community and Economic Development
Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Eschwege:

The U.S. Department of Agriculture has reviewed the draft report entitled "Status of Efforts to Provide Equal Opportunity in Federal Employment; An Interim Progress Report." We are in agreement both with the findings and the recommendations.

We understand that a report is forthcoming which will detail those parts of the subject report relevant to U.S. Forest Service, one of the Agencies reviewed. We would appreciate knowing when we might receive this.

Thank you for the opportunity to review this draft and we apologize for the lateness of our response.

Sincerely,

J. Paul Bolduc
Assistant Secretary
For Administration

ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, D.C. 20301

MANPOWER AND
RESERVE AFFAIRS

6 OCT 1976

Mr. H. L. Krieger
Director, Federal Personnel
and Compensation Division
U.S. General Accounting Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Mr. Krieger:

This is in reply to your letter of August 16, 1976 to Secretary Rumsfeld regarding your proposed report to the Congress on Status of Efforts to Provide Equal Opportunity in Federal Employment: An Interim Progress Report (OSD Case #4435).

Your recommendation on goal setting, page vii, properly places emphasis on recruitment of minorities and women to meet Equal Employment Opportunity goals. But the logic and force of the recommendation is diminished by your recommending a shift away from hiring goals (for fear of "preferential" treatment). Defense Department Affirmative Action Plans must continue to emphasize hiring goals with the clear understanding that Affirmative Action is neither "preferential" nor "discriminatory in reverse." Hence we believe complementary efforts in hiring goals and in recruitment will result in a balanced program.

The report has been reviewed and with the one exception we concur with its conclusions and recommendations.

Sincerely,

John F. Ahearne
Acting Assistant Secretary of Defense
(Manpower and Reserve Affairs)

UNITED STATES OF AMERICA
GENERAL SERVICES ADMINISTRATION
WASHINGTON, DC 20405

October 12, 1976

Honorable Elmer B. Staats
Comptroller General of the United States
General Accounting Office
Washington, DC 20548

Dear Mr. Staats:

We appreciate the opportunity to review your draft report "Status of Efforts to Provide Equal Opportunity in Federal Employment."

We agree with the general concept of all of the General Accounting Office (GAO) recommendations, but can not agree with the practicability of implementation for three of them.

(1) GAO recommends that the Civil Service Commission establish regulations that require all cost reasonably attributable to the EEO program be comprehensively and uniformly included.

If this includes "comprehensive accounting records" as implied on page 47 of the report, the cost of such a system of records would be prohibitive. Furthermore, with the wide dispersion of the various EEO program responsibilities throughout the Federal Government on a part-time basis; e.g., EEO Counselors, EEO Coordinators, line officials, and clerical assistance, it would be an impossible logistics problem for the accurate accumulation of EEO cost.

(2) GAO recommends that the Civil Service Commission devise a system whereby the Commission and other Federal agencies can track groups of persons by race and sex through employment registers to selection or rejection by the agencies. (page 79.)

We know of no way that this could be accomplished by the Civil Service Commission. Applicants for employment with the Federal Government, whose names are contained on registers, are not identified by ethnic group or sex.

(3) GAO recommends that the Civil Service Commission consider revamping the Federal EEO Program by shifting the emphasis of agency goal setting from hiring, or selection, to the recruitment process.

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The GAO recommendation that recruitment, rather than hiring, goals be set is unrealistic in light of the circumstances. It is not possible at this time for agencies to recruit anyone except for COOP reasons. All others must take the PACE Exam, which is now scheduled only intermittently. In addition to passing the Exam, an applicant must place high enough to outrank the large number of Veterans who receive special preference. Even with that, there is no way to ensure that minority or female candidates will be on registers sent by the Commission. Perhaps GAO might address the real problem - that of the Veterans preference which eliminates most minorities and females with perfect scores or highest ratings. Individual Veterans preference provisions might include a "sunset clause" after five years of "re-assimilation" into the civilian work community, thus enabling Government agencies to address the EEO Program on its merits.

It should not be inferred that GSA is objecting to setting recruitment goals - they are necessary to ensure that, in taking affirmative actions, an agency is choosing from the most qualified, and the broadest possible base. What is being questioned, however, is the replacement of hiring goals by recruitment goals. Should that occur, an agency may meet all of its goals, yet never change the representation of its work force.

Sincerely,

Terry Chambers

TERRY CHAMBERS
Deputy Administrator

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20201

AUDIT AGENCY

OCT 6 1976

Mr. Donald G. Goodyear
Assistant Director, Federal Personnel
  and Compensation Division
United States General
  Accounting Office
Washington, D.C. 20548

Dear Mr. Goodyear:

As discussed with Mr. Vengrin of my staff, we're enclosing some technical comments developed by the Department's EEO staff that you may wish to consider in finalizing your draft report.

The Department's formal comments, which should be signed shortly, will respond only to general points as requested. Let me know if you have any questions on this matter. Thanks.

Sincerely yours,

FJMajka
F.J. Majka
Assistant Director
HEW Audit Agency

Enclosure

MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY

TO : Mr. F. J. Majka
Assistant Director
HEW Audit Agency

DATE: October 1, 1976

FROM : Director, Equal Employment
Opportunity Staff

SUBJECT: Proposed GAO Report: "Status of Efforts to Provide Equal Opportunity in Federal Employment"

First of all, we wish to commend GAO on the outstanding job, the preparation of Status of Efforts to Provide Equal Opportunity in Federal Employment: An Interim Progress Report required. It is broad, but not exhaustive of the subject. While the report title suggests a comprehensive review of Federal EEO, the bulk of it deals only with Federal hiring practices. Failure to consider upward movement of employees, full utilization of skills and potential, and career development in-depth may ultimately cast doubt upon many conclusions and therefore nullify the related recommendations.

Yet, the report clearly identifies some of the major issues to be dealt with. The Chapter 10 treatment of the troublesome EEO/merit system interface and competition among different special emphasis programs issues is very good. The report's treatment of these issues provides excellent foundation for future consideration and studies. However, we do not think it is enough merely to identify problems for the Civil Service to grapple with when specific problems clearly require the attention of Congress. We think GAO should make this point, further, GAO might also more clearly delineate or describe those areas where agency initiative can apply without further recourse to the Civil Service Commission or the Congress for guidance.

Our comments above are our general observations. Our specific and directed comments follow.

AAP Process and Coverage

The recently issued FPM Ltr. 713-35 and subsequent issuances for specific EEO Plan Assessment Areas from the Civil Service Commission are providing much useful guidance which should ultimately improve different facets of the EEO program. The FPM Ltr. 713-35, however, does not streamline the process or reduce the time to prepare a plan to any significant degree.

GAO note: Chapter 10 referred to appears as chapter 2.

1. Multi-year Plan - we strongly support the multi-year plan concept. However, we do not believe that there is any validity for differing requirements for national plans versus regional.

   We are inclined to recommend a three year cycle for regional and national plans in that the process is equally demanding and time-consuming for both.

   In a large Department, just the bottom-up input process takes about six months. It is an important process insuring that the coordinators and policy makers of EEO keep in touch with the rank and file. It also educates and involves managers and employees in "thinking EEO"; nevertheless, the problems don't change that rapidly from inventory to inventory. The law requiring annual plans needs to be changed so that the energies and resources of EEO officials and managers can be reassigned to implementation and monitoring. Submitting plans once every three years with staggered submission dates of different years for different Departments or agencies would significantly cut down on the AAP review workload of the CSC and permit a more indepth and timely review.

2. Plan Coverage - We agree that much more discussion is needed regarding the criteria for which organizational units at what levels need to prepare individual plans and which ones should be submitted to the CSC for review and approval. We tend to think that size is overrated as a factor for consideration. Equally and often more important are such things as location of implementation authority, geographic location and/or the variety of missions of the different units necessitating different approaches. We recommend that instead of issuing general guidelines applicable to all, that national EEO offices of Departments or agencies negotiate with national CSC on an individual basis as to the overall AAP system and coverage for that Department or agency. This would help to eliminate conflicting CSC regional instructions. HEW is presently in the process of trying to do just this with the CSC.

3. Monitoring and Evaluation - More pertinent to the monitoring process than synthesizing existing published materials would be for CSC to set monitoring priorities, determine what it wants to monitor and why. In addition, monitoring should be separated from the planning process. The FPM Ltr. No. 713-35 requires in Part B of the affirmative action plan a report of accomplishments. Except for separate reports on complaints and staffing submitted to the CSC on a regular basis, the chief AAP monitoring tool for the CSC, aside from personnel management evaluation and occasional on-site visitations, is this once a year accomplishment report which is received too late to allow for real monitoring. It makes the AAP unwieldy. It is written in as favorable a light as possible both because the plan is usually published and to assure CSC approval of the plan. The accomplishment report is not needed in the plan itself. Any pertinent or useful information in it usually has to be repeated in the problem analysis section.

   Instead of including an accomplishment report in the plan and instead of submitting an annual update plan which includes an accomplishment report, we recommend that CSC require every six months a monitoring report according to assessment area that would automatically include any necessary updates. This would help insure that real monitoring takes place and would keep the plan a living, pertinent document for the three year period. It would also release staff from plan writing and insure that energies are devoted to implementing, monitoring and evaluating.

Management Commitment

Insufficient top management commitment continues to be a major EEO problem to be addressed. The lack of it shows up not so much in weak policy statements or being inaccessible to the EEO officials, but in really getting EEO on the manager's own agenda of priorities. It shows up through lack of insistance that AAP deadlines be met, or actions accomplished, in assignment of sufficient staff for EEO responsibilities and absence of convincing expressed concern that supervisory evaluations reflect EEO consideration in a meaningful way.

So often concern tends to be more for complying with the legal requirements that a plan be written than it is for requiring aggressive implementation and action to insure that equal opportunity is provided to employees and potential employees.

Stronger interface between CSC with top managers throughout the review process at headquarters and regional levels, and closer monitoring would help to promote more top management commitment to affirmative action programming.

Recruitment

The problems of developing and implementing hiring goals versus quotas with their ambiguous definitions are clearly laid out in the GAO report. Perhaps it is now time to recognize and define those areas, where, for a specified period of time, selective recruitment should be taking place in order to demonstrably include heretofore excluded and underrepresented segements of society in the Federal workforce.

Meanwhile, to insure that "equal" employment opportunity is offered without preferential hiring treatment, setting recruitment (defined as developing a supply of qualified applicants) objectives for specific, underrepresented groups is worthwhile on the assumption that those hired will generally reflect the increased percentages of women and minorities among the qualified candidates.

In addition to the points outlined in the report regarding the need for improved workforce analyses along occupational lines and the noting and tracking of minorities and women by CSC through the recruiting, testing and hiring process, other changes must be initiated in order for setting recruitment objectives or goals to have much validity. For vacancies in occupational series that have been identified as underrepresented due to a paucity of candidates or a scarcity of resources, managers must be required to keep the position open for a sufficient time to allow for indepth recruitment activities to take place. Such a requirement must be tied to a consideration for whether the CSC register reflects sufficient qualified minority and women candidates. Registers that are lacking candidates from underrepresented groups should be carefully evaluated to determine the sufficiency of recruitment efforts.

There are many who feel that hiring goals are necessary and should be required in some areas. In our opinion, improved recruitment activities, closer monitoring and reporting on the results of such actions would be the determinant factor in setting recruitment goals. Hiring goals and monitoring thereof must be considered where the problem rests on hiring and selection rather than at the recruitment level.

Upward Mobility

Outside hires, of course, are not the only source of candidates for vacancies. Since so many minorities and women are hired in lower level jobs, an effective upward mobility program is a very important EEO tool. The absence in the report of any discussion of this facet of EEO is glaring and provides an over emphasis on recruitment as an EEO tool, particularly during a recession when the supply of candidates far exceeds the number of potential vacancies and the impact of new hires exacerbate the problems of on-board employees in deadend jobs.

The intent that upward mobility training is to assist employees to maximize their potential per P.L. 92-261, is undercut by manager's disinclination, supported by GETA policy, to spend money for training not clearly and specifically related to the needs of the organizational unit where the employee is presently located.

Different facets of the upward mobility program as prescribed by the CSC and/or conflicting laws need examining. There has been too much separation of upward mobility considerations from the rest of the EEO program. The CSC has taken steps to remedy the situation through required improved coordination and by including both upward mobility/personnel specialists and EEO officials on its IAG Subcommittee on Upward Mobility.

Policy Development

With the periodic turnover of staff, policies and guidelines at the CSC and agency levels are often being developed by persons whose front line AAP experience is often insufficient to recognize the implications or anticipate correctly the impact of the policies and guidelines being developed. Such situations are hard to avoid. However, we feel that the forum provided by the

IAG Subcommittees of CSC, if given sufficient support by the participating agencies, has much potential for alleviating the problem. We look forward to further discussions with CSC regarding the issues raised in this memorandum as well as other points discussed in the GAO report such as the role of special emphasis programs, conflicting policies, the organization of EEO, EEO priorities (long term and short term) and EEO definitions.

Samuel M Hoston

Samuel M. Hoston

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20201

OCT 8 1976

Mr. Gregory J. Ahart
Director, Human Resources
Division
United States General
Accounting Office
Washington, D.C. 20548

Dear Mr. Ahart:

The Secretary asked that I respond to your request for our general comments on your draft report entitled, "Status of Efforts to Provide Equal Opportunity in Federal Employment."

Department officials have carefully reviewed the subject report and believe it does a commendable job of setting forth some of the major issues that must be dealt with. The two areas of EEO/Merit System interface and the competition among the various special emphasis programs are very troublesome ones. The discussion in Chapter 10 of the report provides an excellent foundation on which to build future studies to solve these and other problems.

In addition to these general comments, we have provided Donald Goodyear of your staff with some technical comments that you may wish to consider in finalizing your draft report. We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,

~~John D. Young~~
Acting Assistant Secretary, Comptroller

GAO note: Chapter 10 referred to appears as chapter 2.

United States Department of the Interior
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

OCT 12 1976

Mr. Henry Eschwege
Director, Community and Economic
Development Division
U. S. General Accounting Office
Washington, D. C. 20548

Dear Mr. Eschwege:

We appreciate the opportunity to review and comment on your draft report "Status of Efforts to Provide Equal Opportunity in Federal Employment: An Interim Progress Report". We feel that GAO has prepared a comprehensive document which pinpoints a number of issues which have been of major concern within the EEO community for some time. If the recommendations made to the Civil Service Commission are accepted and acted upon, the EEO program will be improved greatly.

We expect that the GAO will provide more specific information to the individual agencies included in the study. While both the Fish and Wildlife Service and the National Park Service participated in the study, the Department, as well as the bureaus, themselves, are unable to take corrective action, as necessary, since specific agency findings are not identified.

We concur with the proposed shift of emphasis of goal setting from hiring to the recruitment process; however, while an increased emphasis on recruitment is desirable, we feel strongly that this should not be considered a substitute for establishing and monitoring realistic goals in hiring. This approach could result in an agency "looking good" by pursuing recruitment-related activities but actually accomplishing little in terms of results in actual hiring. Without establishing hiring goals, the recruitment activities could be meaningless window-dressing. The problem with establishment of uniform and realistic goals that are discussed in pages 67-80 should be dealt with and goal setting methods refined. One step toward this could be establishment of a system for identification of race and sex of individuals on employment registers. However, the GAO recommendation on page 79 would stop short of this, providing only for tracking groups of persons by race and sex through

CSC registers to selection or rejection by the agencies. The inability to obtain information identifying minority candidates, except by face to face interviews of an excessively large number of candidates, is a serious impediment to considering all groups equally at hiring time. Accordingly, we believe that one of the best conclusions that could come out of the GAO study is that CSC should revamp its registers to provide race and sex information for individual candidates.

A basic assumption of the report is that "EEO's long-range goal is to become part of the personnel system". In the context of a system, albeit our perception of the broader human resource management system, we agree that EEO programs should be an integral segment. However, the draft GAO report also discusses organizational placement, and we are concerned that the stated goal might be interpreted as an organizational rather than a system issue. Our position is that each agency must be permitted to organize and staff their EEO program in the most effective and efficient manner as determined by the Agency.

We are concerned by the statement on page 61 which reads: "We believe that the EEO staffs should make greater use of the expertise and resources of the Personnel Office, but that Personnel officials should have overall responsibility for recruitment, EEO training, and personnel evaluations of the EEO program, with active participation on the part of the EEO office". (Underlining provided for emphasis.) Personnel offices tend to be understaffed so it is unrealistic to suggest that Personnel Directors use their precious few resources for a recruiting program when quite often they need only perform a placement service.

The evaluation of any program must, in our opinion, be conducted by the organization having authority and responsibility to make changes or implement program policies and procedures. Therefore, while the actual evaluation may be conducted as a joint effort to eliminate duplication and increase communications between EEO and Personnel, the basic responsibility for program evaluation must rest distinctively with each program area.

Reduction of duplication of effort, as discussed on page 61, should result in a utilization of resources to accomplish EEO objectives. We do not agree that this would or should result in a decrease in the total resources applied to the program effort, as suggested by the final sentence on page 61.

We do not feel that the problem of special interest groups was sufficiently addressed. As the report states on page 151, "Are there too many 'spcial emphasis' groups, such as minorities, Spanish-speaking minorities, women, handicapped, and aged, each with its own separate piece of action? If so, are the efforts in behalf of these separate groups often conflicting and do they fragment and diffuse the effectiveness that a more unified EEO effort might have?" In our estimation, this report did not address itself adequately to this question. Our recommendation is an overall-organized affirmative action plan to bring all aspects of the EEO program into focus so that women and minorities may be admitted into the system and then selected under merit regulations.

In conclusion, we are in agreement with the principle of long-range Affirmative Action goals with the emphasis on bringing in under-represented segments of the population via strong concentrated selected recruiting efforts.

Sincerely,

Assistant Secretary,
Administration and Management

GAO note: The page numbers referred to may not correspond to those in this final report.

FINANCE GROUP
Washington, DC 20260

September 20, 1976

Mr. Victor L. Lowe
Director, General Government
Division
U. S. General Accounting Office
Washington, D. C. 20548

Attn: Federal Personnel and Compensation Division

Dear Mr. Lowe:

This responds to your August 13, 1976 letter to the Postmaster General in which you requested the Postal Service's general reaction to your draft report entitled "Status of Efforts to Provide Equal Opportunity in Federal Employment: An Interim Progress Report."

The report effectively describes many of the problems in the Federal EEO program and presents constructive recommendations, some of them affecting the program's basic premises. Their implementation could lead to substantial improvements in the program's operation, acceptance, and success.

For your consideration, I am enclosing comments of our Employee and Labor Relations Group which question the source and accuracy of certain data which the report attributes to the Postal Service. For further discussion of the data in question, you may contact Mr. Alvin J. Prejean, Director, Office of Equal Employment Opportunity, telephone: 245-4702.

Sincerely,

Philip J. G. Skelly
Director, Office of
Management Services

Enclosure

EMPLOYEE AND LABOR RELATIONS GROUP
Washington, DC 20260

SEP 20 1976

MEMORANDUM TO: Mr. Philip J. G. Skelly, Director
Office of Management Services
Finance Group

Subject: GAO Draft Report Entitled "Status of Efforts to Provide Equal Opportunity in Federal Employment:An Interim Progress Report"

The report referenced above has been reviewed by my staff. In general, we agree with the assessment of the report in your memorandum dated August 20, 1976. As is the case with the GAO draft report entitled "Assessment of Federal Government's Discrimination Complaint System," much of the information in the report relates to the Civil Service Commission, and other agencies, and is not relevant to the U. S. Postal Service.

To assist you in your effort to provide comments to the General Accounting Office regarding their draft report, my staff has identified a number of items for your consideration. The items are as follows:

(1) The U. S. Postal Service workforce data presented on pages 14, 17, 21 and 26 of this report are derived from the U. S. Civil Service Commission's Consolidated Personnel Data File. We cannot verify the accuracy of this data without knowing the number and percent of employees excluded from the base as the result of erroneous or missing minority group designators or other significant data bits. More significantly, we have been furnishing the Civil Service Commission computer tapes on a pay period basis for the last several years. We have yet to be furnished with feedback data or analyses from the Consolidated Personnel Data File, even though the Commission justified its establishment citing its value to each agency.

(2) The staff-year and dollar outlay data attributed to the U. S. Postal Service on page 49 of the report does not appear to coincide with data in either the FY76 U. S. Postal Service National Affirmative Action Plan or the FY75 Civil Rights data submission through the Civil Service Commission to the Office of Management and Budget. Consequently, the source and accuracy of the data are in question. (See GAO note 3.)

(3) The report addresses the issues relating to Civil Service Commission review of affirmative action plans from the various federal agencies. However, it does not focus attention on the lack of consistency of the review process from one Civil Service Commission Region to another. This lack of consistency is especially troublesome to the Postal Service, since several of our regions submit affirmative action plans for review and approval to more than one Civil Service Commission Regional Office.

(4) Chapter 10 of this draft is well written, and lists many issues within the Civil Rights arena which require further illumination.

James V. P. Conway

GAO notes: 1. Chapter 10 referred to appears as chapter 2.

2. The page numbers referred to may not correspond to those in this final report.

3. Data obtained from CSC's Office of Federal Equal Employment Opportunity.

DEPARTMENT OF THE TREASURY
WASHINGTON D C 20220

ASSISTANT SECRETARY

OCT 5 1976

Dear Mr. Lowe:

This has reference to your letter of August 13, 1976 to the Secretary of the Treasury concerning the draft of your proposed report to the Congress entitled "Status of Efforts to Provide Equal Opportunity in Federal Employment: An Interim Progress Report".

Appropriate staff members within the Department of the Treasury, the Internal Revenue Service and the U. S. Customs Service, have reviewed the draft report and our general reaction is one of agreement with the general direction of the recommendations contained in the draft. In regard to the report's specific recommendations, we have a number of observations or comments to offer as follows.

Sincerely yours,

Warren F. Brecht
Assistant Secretary (Administration)

Mr. Victor L. Lowe, Director
General Government Division
U. S. General Accounting Office
Washington, D. C. 20548

Enclosure

Department of the Treasury Comments on GAO Report, "Status of Efforts to Provide Equal Opportunity in Federal Employment: An Interim Progress Report"

Recommendation:

(1) CSC should study EEO organizational patterns and advise agencies on the advantages and disadvantages of various arrangements, including recommendations for minimizing duplication of effort and maximizing cooperation between the EEO Office and the Personnel Office.

Comment:

The Department of the Treasury agrees that there is a need for clear cut CSC guidelines relative to the relationship between EEO and Personnel Offices, including the organizational location of the EEO Office. While we agree that there is a need for clear cut guidelines, that in some instances there is a duplication of effort, and that better coordination is needed between EEO and Personnel Office staffs, at this point in time it is desirable that the EEO Office be both organizationally and physically separated from the Personnel Office. Personnel management, i.e., recruitment and training, etc., are personnel functions and should be the responsibility of the Personnel Office, thereby freeing the EEO Office to better monitor those functions and to identify problem areas. It is believed that the separation of the two offices would afford the EEO Office:

(a) greater visibility,
(b) increased credibility, and would
(c) ensure EEO Officers unfettered access to the head of the agency.

Recommendation:

(2) CSC should establish regulations requiring effective EEO cost accounting by agencies.

Comment:

The Department of the Treasury feels that this is a good recommendation. Currently, the absence of established guidelines to record and document the actual costs of EEO expenditures results in a lack of knowledge as to how current resources are being utilized, whether or not maximum program effectiveness is being reached, what criteria can be established and utilized to increase productivity at current resource levels, or the criteria for increasing resource levels as needed. Care must be taken, however, to assure that cost estimating, tracking, etc., does not unduly impede program achievement with additional reporting and paperwork. It should also be pointed out that many elements which may appear to be factors of EEO costs are, or become, integrated into personnel management and would more appropriately be considered personnel management costs.

Recommendation:

(3) CSC should develop a system for tracking EEO statistics through employment registers to selection or rejection by the agencies.

Comment:

The Department of the Treasury is in agreement with this recommendation. The establishment of the recommended tracking system would result in: (1) enabling the CSC to identify those agencies who consistently do not select minorities and/or women for positions in the professional occupational series; and (2) from the agency standpoint produce data essential in order to realistically evaluate hiring success. Figures indicating how many people are actually hired, and how many are in the "available workforce" are relatively meaningless without an indication of the key middle statistics of those actually available on the CSC registers. The lack of these statistics has hampered agencies from directing recruitment to problem areas, setting appropriate hiring goals and measuring the effectiveness of EEO recruitment programs.

Recommendation:

(4) CSC should shift emphasis from "hiring or selection" goals to "recruitment goals".

Comment:

The Department of the Treasury disagrees with this recommendation as stated. Since the enactment of PL 92-261 in 1972, the thrust of the federal EEO program effort has been to assure that minorities and women are given a fair chance to compete for a decreasing number of vacancies. There is still a need to increase managerial awareness of EEO responsibilities, and, due to the limited number of positions available, there is no guarantee that a reliance on recruitment rather than hiring goals would provide a means for increasing the representation of minorities and women in occupations where shortages currently exist. The proposed shift would in all probability, result in the deceleration of hiring of minorities and women.

Such a shift would also reinforce the Civil Rights Commission assessment that the Federal EEO effort makes greater requirements upon the private sector than it makes upon the federal sector.

Appropriate implementation of hiring goals does not result in preferential treatment. An agency should seek to make known its job opportunities, and to encourage and assist people, especially those who have traditionally *not* been allowed to compete fairly, to enter the competitive process. Once this is done -- effectively and with results -- selection and hiring should be based entirely on merit procedures, without regard to any extraneous factor.

The Department of the Treasury recommends that the CSC should create an *expansion* of emphasis to include recruitment goals as well as hiring or selection goals.

Regarding the comment on the reliability of CSC supplied data, we agree that there has been a lack of reliable and authoritative statistics on either a national or regional basis thereby precluding a realistic analysis of workforce availability in order to formulate an effective policy for attracting more minorities and women into the federal workforce.

Recommendation:

(5) The CSC should review current agency designations for submission of EEO Affirmative Action Plans, require major agency components with national responsibilities to submit plans, provide more uniformity in size and responsibility criteria for determining agency installations to submit regional plans, and shift emphasis from maintenance oriented to results oriented action items.

Comment:

The Department of the Treasury agrees with this recommendation. It should be pointed out that the CSC is already moving in this direction, particularly with the recent issuance of FPM Letter 713-35 which emphasized a problem-solving approach to affirmative action planning; and the issuance of an all agency memorandum on June 7, 1976, establishing a listing of regional and local level installation plan submissions. We do feel that considerable improvement of the entire action plan process is urgently needed.

Recommendation:

(6) CSC should consider increased delegation of plan review to agency headquarters and select agency plans for Commission review on a sample basis.

Comment:

Given adequate resources, this is a sound recommendation. The present system of CSC Regional Office approval of action plans mitigates, in practical terms, any national/regional authority, for plan development and evaluation. Additionally, many problems related to adequate coordination of national/regional policy have occurred since the diffused structure of CSC review has resulted in the imposition of different review criteria for plans in different regions.

Recommendation:

(7) There should be an enlarged leadership role by the CSC in the identification and recruitment of qualified minorities and women.

Comment:

The Department of the Treasury supports a more active role by the CSC in providing alternative methods to currently existing procedures for the general recruitment of minorities and women. Additionally, the CSC should increase efforts in encouraging secondary and college students to prepare for and seek government employment. In this regard, the CSC generally should work more closely with educational institutions so that students will have the opportunity to develop job related skills and to successfully deal with the application and employment process. For specific positions, it is necessary that recruiting be done by individual agencies rather than via a centralized recruitment function at the CSC.

Recommendation:

(8) The CSC should establish minimum EEO program evaluation requirements.

Comment:

The Department of the Treasury is in complete agreement with this recommendation. Currently, there are no adequate standards available on a government-wide basis, to measure program effectiveness.

Recommendation:

(10) Comprehensive discussions should be held to air conflicting views on various aspects of EEO.

Comment:

While structured discussions can be useful, we feel that written solicitations of comments on various proposals would be a more efficient manner in which to resolve major issues.

GAO note: Deleted material relates to matters not included in this final report.

VETERANS ADMINISTRATION
OFFICE OF THE ADMINISTRATOR OF VETERANS AFFAIRS
WASHINGTON, D.C. 20420

SEPTEMBER 24 1976

Mr. Gregory J. Ahart
Director, Manpower and
Welfare Division
U. S. General Accounting Office
441 G Street, N. W.
Washington, D. C. 20548

Dear Mr. Ahart:

We have reviewed your draft Report to the Congress, "Status of Efforts to Provide Equal Opportunity in Federal Employment: An Interim Progress Report," dated August 13, 1976.

We feel this report as written will make a valuable contribution to the Federal Equal Employment Opportunity effort and have no changes to suggest.

Sincerely,

RICHARD L. ROUDEBUSH
Administrator

DEPARTMENT AND AGENCY LOCATIONS WHERE WE REVIEWED EEO ACTIVITIES

Civil Service Commission	Headquarters, Washington, D.C. Atlanta Region, Atlanta, Ga. Chicago Region, Chicago, Ill. New York Region, New York, N.Y. San Francisco Region, San Francisco, Calif. St. Louis Region, St. Louis, Mo. Seattle Region, Seattle, Wash.
U.S. Forest Service (Department of Agriculture)	Headquarters, Washington, D.C. Region 3, Albuquerque, N. Mex. Region 6, Portland, Ore. Region 8, Atlanta, Ga. Pacific Southwest Forest and Range Experiment Station, Berkeley, Calif.
Department of the Air Force	Headquarters, Washington, D.C. Griffiss Air Force Base, N.Y. Offutt Air Force Base, Nebr. Aeronautical Systems Division, Wright-Patterson Air Force Base, Dayton, Ohio
Social Security Administration (Department of Health, Education, and Welfare)	Headquarters, Baltimore, Md. Bureau of Data Processing, Baltimore, Md. Region IV, Atlanta, Ga. Region V, Chicago, Ill. Region IX, San Francisco, Calif.
U.S. Fish and Wildlife Service (Department of the Interior)	Headquarters, Washington, D.C. Region 4, Atlanta, Ga.
National Park Service (Department of the Interior)	Headquarters, Washington, D.C. Pacific Northwest Region, Seattle, Wash.
U.S. Customs Service (Department of the Treasury)	Headquarters, Washington, D.C. Region 4, Miami, Fla. Region 7, Los Angeles, Calif.
Internal Revenue Service (Department of the Treasury)	Headquarters, Washington, D.C. Brooklyn District, Brooklyn, N.Y. Kansas City Service Center, Kansas City, Mo.

General Services Administration	Headquarters, Washington, D.C Region 2, New York, N.Y. Region 5, Chicago, Ill. Region 6, Kansas City, Mo. Region 10, Auburn, Wash.
United States Postal Service	Headquarters, Washington, D.C. Kansas City Post Office, Kansas City, Mo. Manhattan Post Office, New York, N.Y. San Jose Post Office, San Jose, Calif.
Veterans Administration (VA)	Headquarters, Washington, D.C. VA Research Hospital, Chicago, Ill. VA Hospital, Kansas City, Mo. VA Hospital, Martinez, Calif.

RECAP OF DEPARTMENT AND AGENCY LOCATIONS VISITED

	Headquarters locations	Field locations	Total
Federal departments and agencies (excluding CSC)	10	27	37
CSC	1	6	7
Total	11	33	44

PRINCIPAL OFFICIALS RESPONSIBLE FOR ADMINISTERING ACTIVITIES DISCUSSED IN THIS REPORT

	Tenure of Office	
	From	To
CIVIL SERVICE COMMISSION		
CHAIRMAN, CIVIL SERVICE COMMISSION:		
Alan K. Campbell	May 1977	Present
Georgiana H. Sheldon (acting)	Dec. 1976	May 1977
Robert E. Hampton	Jan. 1974	Dec. 1976
EXECUTIVE DIRECTOR:		
Raymond Jacobson	Jan. 1975	Present
Bernard Rosen	Jan. 1974	Jan. 1975
ASSISTANT EXECUTIVE DIRECTOR:		
Joseph W. Lowell, Jr.	July 1975	Present
Irving Kator	Jan. 1974	July 1975
DIRECTOR, BUREAU OF PERSONNEL MANAGEMENT EVALUATION:		
John D.R. Cole	Jan. 1974	Present
DIRECTOR, FEDERAL EQUAL EMPLOYMENT OPPORTUNITY:		
James A. Scott (acting)	Feb. 1977	Present
Anthony W. Hudson	Mar. 1974	Feb. 1977
U.S. FOREST SERVICE (DEPARTMENT OF AGRICULTURE)		
CHIEF:		
John R. McGuire	Jan. 1974	Present
ASSOCIATE CHIEF FORESTER:		
R. A. Resler	Jan. 1974	Present
DIRECTOR OF PERSONNEL MANAGEMENT:		
Wallace R. Otterson	June 1974	Present
Orlo M. Jackson	Jan. 1974	June 1974

	Tenure of Office	
	From	To
DIRECTOR OF CIVIL RIGHTS:		
Jetie Wilds	Sept. 1975	Present
DEPARTMENT OF THE AIR FORCE		
SECRETARY OF THE AIR FORCE:		
John Stetson	Apr. 1977	Present
Thomas C. Reed	Dec. 1976	Apr. 1977
James W. Plummer (acting)	Nov. 1975	Nov. 1976
John L. McLucas	Jan. 1974	Nov. 1975
DEPUTY ASSISTANT SECRETARY, PERSONNEL POLICY:		
James P. Goode	Jan. 1974	Present
ASSISTANT FOR EQUAL OPPORTUNITY:		
William R. Beard	Jan. 1974	Present
DIRECTOR OF CIVILIAN PERSONNEL:		
J. Craig Cumbey	Mar. 1977	Present
Vacant	Jan. 1976	Mar. 1977
C. T. McConathy	Jan. 1974	Dec. 1975
CHIEF, EQUAL EMPLOYMENT OPPORTUNITY OFFICE:		
Manuel Oliverez	Jan. 1974	Present
SOCIAL SECURITY ADMINISTRATION (DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE)		
COMMISSIONER OF SOCIAL SECURITY:		
James B. Cardwell	Jan. 1974	Present
ASSOCIATE COMMISSIONER FOR MANAGEMENT AND ADMINISTRATION:		
Francis D. DeGeorge	Jan. 1974	Present
DIRECTOR OF PERSONNEL:		
Ian Paris	Jan. 1974	Present
CHIEF, SPECIAL STAFF FOR EQUAL OPPORTUNITY:		
Herbert Creech	Jan. 1974	Present

	Tenure of Office	
	From	To
U.S. FISH & WILDLIFE SERVICE (DEPARTMENT OF THE INTERIOR)		
ASSISTANT SECRETARY FOR FISH AND WILDLIFE AND PARKS:		
Nathaniel P. Reed	Jan. 1974	Present
DIRECTOR, U.S. FISH AND WILDLIFE SERVICE:		
Lynn A. Greenwalt	Jan. 1974	Present
DIRECTOR OF PERSONNEL:		
Joseph E. Dodridge, Jr.	Apr. 1975	Present
Carolyn C. Frame	Aug. 1974	Mar. 1975
Theodore C. Krell	Jan. 1974	July 1974
CHIEF, EQUAL EMPLOYMENT OPPORTUNITY OFFICE:		
Barbara Payne	Jan. 1974	Present
NATIONAL PARK SERVICE (DEPARTMENT OF THE INTERIOR)		
DIRECTOR:		
William J. Whalen	June 1977	Present
Gary E. Everhardt	Jan. 1975	May 1977
Ronald H. Walker	Jan. 1974	Jan. 1975
CHIEF PERSONNEL OFFICER:		
Barbara L. Hickman	July 1976	Present
Vacant	Dec. 1975	July 1976
Raymond Gunter	Jan. 1974	Dec. 1975
EQUAL EMPLOYMENT OPPORTUNITY OFFICER:		
Robert Nunn	Jan. 1974	Present
U.S. CUSTOMS SERVICE (DEPARTMENT OF THE TREASURY)		
COMMISSIONER:		
Vernon D. Acree	Jan. 1974	Present
ASSISTANT COMMISSIONER, ADMINISTRATION:		
John A. Hurley	Jan. 1974	Present

	Tenure of Office	
	From	To
DIRECTOR OF PERSONNEL:		
J. Murry Martin	Jan. 1974	Present
DIRECTOR, EQUAL EMPLOYMENT OPPORTUNITY DIVISION:		
Rector L. Smith	Jan. 1974	Present

INTERNAL REVENUE SERVICE
(DEPARTMENT OF THE TREASURY)

COMMISSIONER:		
Donald C. Alexander	Jan. 1974	Present
ASSISTANT COMMISSIONER, ADMINISTRATION:		
Joseph T. Davis	Aug. 1974	Present
Joseph T. Davis (acting)	Jan. 1974	Aug. 1974
DIRECTOR OF PERSONNEL:		
Billy J. Brown	Jan. 1974	Present
EQUAL EMPLOYMENT OPPORTUNITY OFFICER:		
Barbara Thompson	Jan. 1974	Present

GENERAL SERVICES ADMINISTRATION

ADMINISTRATOR:		
Joel W. Solomon	May 1977	Present
Robert T. Griffin (acting)	Feb. 1977	May 1977
Jack M. Eckerd	Nov. 1975	Feb. 1977
Dwight A. Ink (acting)	Oct. 1975	Nov. 1975
Arthur F. Sampson	Jan. 1974	Oct. 1975
DIRECTOR, OFFICE OF PERSONNEL:		
John R. Hankerd	Apr. 1977	Present
James W. Hardgrove	Jan. 1974	Apr. 1977
DIRECTOR, EQUAL EMPLOYMENT OPPORTUNITY:		
John R. Hankerd	Apr. 1977	Present
James W. Hardgrove	Jan. 1976	Apr. 1977
DIRECTOR, OFFICE OF CIVIL RIGHTS:		
Edward Mitchell	Jan. 1974	Jan. 1976

	Tenure of Office	
	From	To
UNITED STATES POSTAL SERVICE		
POSTMASTER GENERAL:		
Benjamin F. Bailar	Jan. 1975	Present
SENIOR ASSISTANT POSTMASTER GENERAL, EMPLOYEE AND LABOR RELATIONS:		
James V. P. Conway	Sept. 1975	Present
Vacant	Apr. 1975	Aug. 1975
Darrell F. Brown	Jan. 1975	Apr. 1975
DIRECTOR, OFFICE OF EQUAL EMPLOYMENT OPPORTUNITY:		
Alvin Prejean	Jan. 1975	Present
VETERANS ADMINISTRATION		
ADMINISTRATOR:		
Max Cleland	Mar. 1977	Present
Richard L. Roudebush	Oct. 1974	Mar. 1977
Donald E. Johnson	Jan. 1974	Oct. 1974
ASSISTANT ADMINISTRATOR FOR PERSONNEL:		
Richard D. Brady	Jan. 1974	Present

GAO REPORTS ISSUED ON THE SUBJECT OF THE EQUAL EMPLOYMENT OPPORTUNITY ACT OF 1972 AS IT RELATES TO FEDERAL EMPLOYEES AND JOB APPLICANTS

1. National Aeronautics and Space Administration's Equal Employment Opportunity Program Could Be Improved, FPCD-75-107, April 16, 1975.

2. Upward Mobility Programs in the Federal Government Should Be Made More Effective, FPCD-75-84, April 29, 1975.

3. Equal Employment Opportunity Discrimination Complaint Systems for Civilian Employees at Selected Army Installations, FPCD-75-118, May 28, 1975.

4. Report on Management Information Needs of the Equal Employment Opportunity Program of the Federal Government, U.S. Civil Service Commission, FPCD-76-71, September 3, 1976.

5. General Services Administration's Upward Mobility Program, FPCD-76-84A, September 13, 1976.

6. Review of Upward Mobility Using Job Restructuring, Department of the Interior, FPCD-76-84, November 2, 1976.

7. Review of the Department of the Army's Upward Mobility Program, FPCD-77-3, December 13, 1976.

8. Upward Mobility Using Job Restructuring, Department of the Navy, FPCD-77-9, January 7, 1977.

9. Upward Mobility Using Job Restructuring, Department of the Air Force, FPCD-77-8, January 10, 1977.

10. Upward Mobility Program Can be Improved, Department of Agriculture, FPCD-77-2, March 21, 1977.

11. Report on Progress Made by Agencies in Implementing Upward Mobility Programs, U.S. Civil Service Commission, FPCD-77-10, March 28, 1977.

12. System for Processing Individual Equal Employment Opportunity Discrimination Complaints: Improvements Needed, FPCD-76-77, April 8, 1977.